

D. History (October 1, 1984 - January 31, 1986)

Violation: No Class I Violations Date: 06-16-85 CEI

Description of Violation: _____

Informal Enforcement Action Taken: Yes ☐ (If Yes, describe below) No ☐Type of Informal Action: _____ Date: _____
_____ Date: _____

Response Due Date: _____ Actual Compliance Date: _____

Number days from inspection finding violation to informal enforcement: _____

Formal Enforcement Due by: _____ (timely and appropriate criteria)

Formal Enforcement Action Taken: Yes ☐ (If Yes, describe below) No ☐

Type of Formal Action: _____ Date: _____

Responsible Agency: State _____ EPA _____

Scheduled Compliance Date: _____ Actual Compliance Date: _____

Number days from inspection finding violation to formal enforcement: _____

Returned to compliance without enforcement: Yes ☐ (if Yes, Date: _____)Violation: No Violations Date: 10-29-85 Closure Insp.

Description of Violation: _____

Informal Enforcement Action Taken: Yes ☐ (if Yes, describe below) No ☐

Type of Informal Action: _____ Date: _____

Response Due Date: _____ Actual Compliance Date: _____

Scheduled Compliance Date: _____ Actual Compliance Date: _____

Number days from inspection finding violation to informal enforcement: _____

Formal Enforcement Due by: _____ (timely and appropriate criteria)

Formal Enforcement Action Taken: Yes ☐ (if Yes, describe below) No ☐

Type of Formal Action: _____ Date: _____

Responsible Agency: State _____ EPA _____

Scheduled Compliance Date: _____ Actual Compliance Date: _____

Number days from inspection finding violation to formal enforcement: _____

Returned to compliance without enforcement: Yes ☐ (if Yes, Date: _____)

E. Lois of Interim Status (LOIS)

Facility Certified: Groundwater: Yes ☐ No ☒
Financial: Yes ☐ No ☒ Not Subject ☐

Submitted Part B: Yes ☐ No ☒

Submitted Closure Plan: Yes ☒ No ☐

EPA LOIS Inspection: Yes ☒ (if Yes, Date: 05-01-86)
No ☐

LOIS Violation Discovered: Yes ☐ (If Yes, describe below:
_____))
No ☒

Enforcement: Yes ☐ (if Yes, check reason)

For Groundwater: ☐

For Financial: ☐

For Closure: ☐

Operating In Violation: ☐

Date Enforcement Taken by EPA: ☐

Anticipated Enforcement to be taken: Yes ☐ No ☒

ATTACHMENT III

LOSS OF INTERIM STATUS
REGION VI EPA
R06-01-06

1. Reviewer: DGS/SAF
2. Facility name: HOUSTON LIGHTING & POWER - WHARTON GEN. STA
3. Address/location: P.O. BOX 1700
HOUSTON, TX. 77001
4. EPA I.D. No.: TXD 000837351

TDWR# 31636

5. Type of RCRA units
requiring certification:

(2) METAL CLEANING ORGANIC

- * A. S.I. - ACIDS COLLECTION POND H. _____
DEMINERALIZER REGENERANT
- * B. S.I. - COLLECTION POND I. _____
- C. _____ J. _____
- D. _____ K. _____
- E. _____ L. _____
- F. _____ M. _____
- G. _____ N. _____

* Q. 22

Yes No Not
Determined

6. Is groundwater certification
required? If yes, continue to
Question 7. If no, go to Question
22.
7. Is financial assurance certifica-
tion required? If yes, continue
to Question 8. If no, go to
Question 22.

☐ ☒ ☐

☐ ☒ ☐

	Yes	No	Not Determined
8. Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and go to Question 20.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Documentation available?			
a. Part A Submittal - Date: <u>11/18/80</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Part B Submittal - Date: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Topographic Map -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Section 3007 Response - Date: _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Closure Plan - Date: <u>8/84</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Post-Closure Plan - Date: <u>Clean Close</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. RCRA Inspection - Date: <u>1/16/85</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Other - <u>Signed</u>	<u>Received</u>		<input type="checkbox"/>
i. <u>Certification</u> Date: _____			
ii. _____ Date: _____			
iii. _____ Date: _____			
iv. _____ Date: _____			
v. _____ Date: _____			
12. Do all documents listed in Question 11 agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14. If no, go to Question 22.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No	Not Determined
14. Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Q. 22		
15. Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Which of the following options were used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.	<u>Closure Cost</u>	<u>Insurance Part B</u>	<u>Available</u>
a. Closure trust fund:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Surety bond guaranteeing payment into a closure trust fund:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Surety bond guaranteeing performance:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Closure letter of credit:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Closure insurance:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Financial test/corporate guarantee:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Multiple financial mechanisms:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Which of the following options were used to demonstrate financial assurance for post-closure? Note: Check yes for the appropriate method - it is not necessary to check no for those which do not apply.	<u>POST CLOSURE Cost</u>	<u>Insurance Part B</u>	<u>Available</u>

- | | Yes | No | Not
Determined |
|--|--------------------------|--------------------------|--------------------------|
| a. Post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Surety bond guaranteeing payment into a post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Surety bond guaranteeing performance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Post-closure letter of credit: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Insurance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Financial test/corporate guarantee: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Multiple financial mechanisms: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. ^{GROUNDWATER} Is certification considered complete? If no, explain in Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Is financial assurance considered complete? If no, explain in Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 20. If the answer to Questions 8, 9, 18, or 19 is no, was a closure plan submitted? If yes, continue to Question 21. If no, go to Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 21. If the answer to Questions 8, 9, 18, or 19 is no, was a post-closure plan submitted? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 22. Briefly discuss the problems or discrepancies identified and determine if they are of a nature which prevents further review. | | | |

These units have been closed & certified by a
Registered P.E.
TWDR certified financial assurance & sudden/loss-sudden
insurance on 4/23/85.

FY 1985 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

Coordinator Initials

14. Handler Type: ☒ Major

EPA ID: TX1D010023735-1

Handler Name: _____

☐ Non-Major

Address: _____

DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 85/01/16
 SA. AGENCY RESPONSIBLE FOR EVALUATION: _____
 Put code in box: 12
 Choose one: _____

TYPE OF EVALUATION COVERED BY THIS REPORT:
 Put code in box: 12
 Choose one: _____

DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 3): 85/01/16

AREA AND CLASS OF VIOLATION (enter 'X' in appropriate box if violations found. Enter '0' if no violations found in Area violated.)

Class of Violation	GM	CL/PC	Inf. Res.	Pt. B	Capl. Sch.	Manifest	Other	PP1	PP2	PP3
1	0	0	0	0	0	0	0	5	02	JL
2	0	0	0	0	0	0	0	5	02	JL

ENFORCEMENT ACTIONS:

Area of Violation: _____ Date Action: _____ Compliance Dates: _____ Penalty: _____
 Class: _____ Taken: _____ Scheduled: _____ Assessed: _____ Collected: _____ (use code)

Codes for Types of Enforcement Actions: 03 = Warning Letter 11 = Filed Civil Action
 05 = Administrative Order 12 = Filed Criminal Action
 10 = Informal 13 = EPA letter to States

(See instruction for additional codes) E = EPA
 Codes for Responsible Agency: _____
 Comments: Closure of facility #02 is complete (Harter). Full cleanup (and SI & follow-up) GUM

(Limit each comment to 80 characters. Up to 99 comments are possible.)

2-13-85



HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

NEW ☐ UPDATE ☐

TOWR ID: 31636 1. EPA ID: T X D 0 0 0 3 3 7 3 5 1 INDUSTRY: HL & P DISTRICT: 07
 2. INDUSTRY NAME: Houston Lighting & Power; Wharton Station 19 28 30 31
 3. SITE ADDRESS: 16301 W. Montgomery Rd. PHONE: 713.922-2200 COUNTY: HARRIS
 ZIP: 77001

7. DATE SUBT: 01-15-85 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00
 (CENTRAL OFFICE USE ONLY) 6. TYPE OF EVALUATION: EC (CEI-EV, EC; CME-GW; OTHER-CL, SW; SAMPLE-SA; FOLLOW UP-FO; RECORD REVIEW-RC, RF; FOR HIGH PRIORITY PLACE H IN 1ST BLOCK)

5. DATE OF INITIAL EVALUATION: 01-16-85 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00
 RESPONSIBLE AGENCY: S

E v a l u a t i o n		Date Notice of Violation		Date Conference		Date Refer. to Austin for Enf.		Date High Prior. Determination		Date of Estim. Compliance		Date Response is Due for Nov.		Date of Actual Compliance		Resolve/Unres./Complaint	
G W	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00	X															
C L	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00	X															
P T	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00																
M A	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00	X															
F I	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00	X															
S C	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00																
O T	56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00																

COMMENTS: (COUNTY)

1 3 5 7 9 12 14 16 18 21 23 25 27 30 32 34 36 39 41 43 45 48 50 52 54 57
 01 101
 02 Closure of Facility #02 is complete. GWM resumed late 1984. (PARTIAL). Full closure 2nd S.I. to follow. (3 X S.I.)

RECEIVED

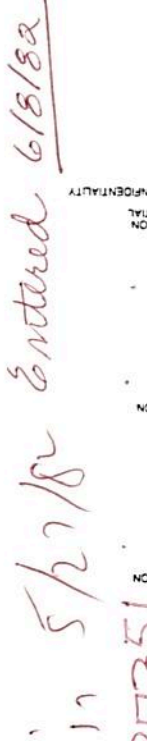
JAN 25 '85

ENFORCEMENT AND
FIELD OPERATIONS

SUBMITTED BY: JAY LANAHAN

NO. OF SAMPLES: 0

WORK NO: 9091



COULD THERE
HAVE BEEN
DEL676

[illegible]

FACILITY IDENTIFICATION NUMBER		SIC		NEW SIC	
1	2	1	2	1	2
3	4	3	4	3	4
5	6	5	6	5	6
7	8	7	8	7	8
9	0	9	0	9	0
1	2	1	2	1	2
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5	6				

	TRANSPORT MODE	WATER	ROAD	RAIL	AIR
	ACTIVITY CODE	GEN	TRANS	TSD	SIC

[illegible][illegible]

FACILITY IDENTIFICATION NUMBER	OPERATOR CITY	OPER STATE	OPERATOR ZIP CODE	INDIAN LAND
r	3	0	40 41 42 47	M
2	13 14 15 16		51 52	N0

FACILITY IDENTIFICATION NUMBER										FACILITY OWNER NAME										OWNER PHONE																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40

[illegible][illegible]

CAMPUS 2 COLUMN 43 BCTA COMMERCIAL

in 5/27/82
Entered 6/17/82

CARD CODING FORM

PROGRAM RCRA -- Waste Maintenance Form PROCESSES

PROGRAMMER

DATE

3 EPA ID Number
SEQ No.
Waste Code
Proc. Proc.
Cause

W61
WAVZ

TXD000083735

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F005

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Hazardous Waste Compliance Monitoring and Enforcement Log

OK #

1. EPA ID: <u>TXD101018373511</u>		4. HANDLER TYPE: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MIN-MAJOR																																																																																						
2. HANDLER NAME: <u>Houston Lighting & Power Co - Wharton</u>																																																																																								
3. ADDRESS: <u>16301 W. Montgomery Rd 77001</u>																																																																																								
5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: <u>8/4/08/25</u> M D Y		Seq # <u>10-27-844</u>																																																																																						
5. TYPE OF EVALUATION COVERED BY THIS REPORT: <u>Action A.C. or D</u>		RESPONSIBLE AGENCY: <u>S</u>																																																																																						
7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): <u>8/4/08/15</u> M D Y		RR Type <u>Resp Person</u>																																																																																						
8. AREA AND CLASS OF VIOLATION (enter number of violations by area and class): <u>A</u> <u>A.C. or D</u>		Area of Violation																																																																																						
		<table border="1"> <thead> <tr> <th>Class of Violation</th> <th>UWH</th> <th>CI/PC</th> <th>Fin. Res.</th> <th>PL. B</th> <th>Cump. Sched.</th> <th>Other</th> <th>Manifest</th> </tr> </thead> <tbody> <tr> <td>I</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>0</td> <td>0</td> </tr> <tr> <td>II</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>0</td> <td>0</td> </tr> <tr> <td>III</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>0</td> </tr> </tbody> </table>		Class of Violation	UWH	CI/PC	Fin. Res.	PL. B	Cump. Sched.	Other	Manifest	I						0	0	II						0	0	III						X	0																																																					
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9. ENFORCEMENT ACTIONS FOR VIOLATIONS:																																																																																								
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Grand Region

LCFF

NEW

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME:

Houston Lighting; Power Co. - Wharton

PHONE: (713) 228-9211

SITE ADDRESS:

16301 W. Montgomery Rd.

ZIP: 77001

COUNTY: Harris

TDWR PERMIT OR REGIS. NO.

31636

EPA ID NO.

TXD000837351

INDUSTRY NAME

H&P WRT

DISTRICT

67

DATE REPORT SUBMITTED

M O F Y
0884

TYPE OF FACILITY

G F T
6 F 3

MAJOR/NONMAJOR

M

TYPE OF EVALUATION

FN

RECEIVED

DATE OF EVALUATION OR ENFORCEMENT REFERRAL

05-25-84

AUG 14 '84

ENFORCEMENT AND
FIELD OPERATIONSTypes Of
Violations

GWM

INC

CLO

FIN

PTB

MAN

SCH

OTH

COMMENTS:

08-02-84

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08-02-84

08-02-84

Date Of
Notif. Letter

08-02-84

Date Of
Inf. Ent. Act.

08-02-84

Date
Response Due

08-02-84

Date Of
Actual Compliance

08-02-84

Resolved/
Unresolved

08-02-84

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08-02-84

WORK NO.: 9094

SUBMITTED BY: D. Parker

NUMBER OF SAMPLES:

X 02 060 Plan Subm 04-01-84.

Types Of Violations	Deg.	Date Of Notif. Letter	Date Of Inf. Enf. Act.	Date Response Due	Date Of Actual Compliance	FIELD OPERATIONS
GWM	56 58	08-02-84	70	08-31-84	08-28-84	Resolved
INC	56 58		70			Unresolved
CLO	56 58	08-02-84	70	08-31-84	08-28-84	Resolved
FIN	56 58		70			Unresolved
PTB	56 58		70			Unresolved
MAN	56 58		70			Unresolved
SCH	56 58		70			Unresolved
OTH	56 58	08-02-84	70	08-31-84	08-28-84	Resolved

ENFORCEMENT
FIELD OPERATIONS

AUG 14 1964

~~DATE OF EVALUATION OR ENFORCEMENT REFERRAL~~

RECEIVED

45 45

25

TYPE OF EVALUATION

42
W

MAJOR/NONMAJOR

40	88
5	5
1	1

~~TYPE OF FACILITY~~

M O / F Y

DATE REPORT SUBMITTED

30	31
9	7

DISTRICT

87								17
I	Y	M		P	L	7	H	

INDUSTRY NAME

T	X	D	0	0	0	8	3	7	3	5	1
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EPA ID NO.

2	3	1	6	3	6
---	---	---	---	---	---

DOWN PERMIT OR REGIS. NO.

INDUSTRY NAME: Houston Lighting; Raver Co. - Wharton
SITE ADDRESS: 16301 W. Montgomery Rd.
ZIP: 77001
COUNTRY: Harris
PHONE: (713) 228-921

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT 44



CPD ARE

Hazardous Waste Compliance Monitoring and Enforcement Log

OK

1. EPA ID: <u>TXD000837351</u>		4. HANDLER TYPE: <input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MIN-MAJOR						
2. HANDLER NAME: <u>Houston Lighting & Power Co - Wharton</u>								
3. ADDRESS:								
5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: <u>8/4/05/25</u>		11-1984 <u>ST</u>						
6. TYPE OF EVALUATION COVERED BY THIS REPORT: <u>Initial</u>		Seq # <u>01</u>						
7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): <u>8/4/05/15</u>		RR Type <u>Resp Person</u>						
8. AREA AND CLASS OF VIOLATION (enter number of violations by area and class): <u>A</u> <u>A, C, or D</u>		RESPONSIBLE AGENCY: <u>S</u>						
9. ENFORCEMENT ACTIONS FOR VIOLATIONS:								
Violation Class	Area	Type of Action Taken (circle one)	Date Action Taken (mdy)	Compliance Dates (mdy) Scheduled	Actual	Penalty Assessed	Collected	Responsible Agency/Person
1	GW	Informal <u>WL/NOV</u> AD CivAc	8/4/05/02	8/4/05/31	8/4/08/21			
		Informal WL/NOV AD CivAc						
		Informal WL/NOV AD CivAc						
		Informal WL/NOV AD CivAc						
		Informal WL/NOV AD CivAc						
		Informal WL/NOV AD CivAc						
		Informal WL/NOV AD CivAc						
		Informal WL/NOV AD CivAc						

10. COMMENTS: Action A Seq # 01 Close Plan submitted 04-01-84 for SI. WL for GQA
Plan - PL

REPORTS

12-14-84

FACILITY ID TXD000837351

NEW ENTRY ☒

CHANGE ENTRY ☐

DELETE ENTRY ☐

DATE DUE

ACTION DATE 84/04/01

RESPONSIBLE AGENCY

RESPONSIBLE PERSON

FREE FIELD 1

FREE FIELD 2

FREE FIELD 3

FREE FIELD 4

FREE FIELD 5

FREE FIELD 6

PERMIT NO 1

ACTION CODE 01

SEQUENCE NO

STATUS CODE

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO

PERMIT ACTION LINK CHANGED FROM

TO

DELETE PERMIT ACTION LINK TO

PERMIT ISSUANCE TRACKING

FACILITY ID

NEW ENTRY

CHANGE ENTRY

DELETE ENTRY

DATE DUE

ACTION DATE

RESPONSIBLE AGENCY

RESPONSIBLE PERSON

FREE FIELD 1

FREE FIELD 2

FREE FIELD 3

FREE FIELD 4

FREE FIELD 5

FREE FIELD 6

PERMIT NO

ACTION CODE

SEQUENCE NO

STATUS CODE

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO

Attachment G

T. H. Wharton Generating Station

Process Description for Hazardous Waste Streams

1. Demineralizer Regenerant (EPA Hazard Code C)
Demineralizer Regenerant Inorganic Sludge (EPA Hazard Code E)

At T. H. Wharton Steam Electric Generating Station, there are three demineralizer units for the boiler make-up water treatment system. The demineralizer regenerant wastes from these three units flow by gravity to the concrete sumps and from there it is pumped to the acid retention pond for collection, equalization and self-neutralization. From the retention pond, the regenerant waste is pumped to the treatment system for pH adjustment and suspended solids removal prior to discharging to Greens Bayou. The treatment system consists of mixing, flocculation, settling, and pH readjustment mixing chambers. Some of the settleable solids are accumulated in the bottom of the acid retention pond. This settled sludge from the pond is periodically removed for off-site disposal.

2. Metal Cleaning Organic Acid (EPA Hazard Code E)
Metal Cleaning Organic Sludge (EPA Hazard Code E)

The organic metal cleaning waste is collected in a lined organic cleaning waste pond for storage and sedimentation. The organic cleaning waste is hauled off-site for treatment and disposal. The sludge accumulated at the pond bottom is periodically removed for off-site disposal.

3. Metal Cleaning Inorganic Acid (EPA Hazard Code C,E)
Metal Cleaning Inorganic Sludge (EPA Hazard Code E)

Boilers and other equipment are periodically cleaned by using a inhibited hydrochloric acid solution. This cleaning waste is piped by gravity to the Inorganic Cleaning Waste Retention Pond where it is collected and equalized. From the retention pond the wastewater is pumped to the treatment system as described for demineralizer regenerant, for heavy metals removal and pH adjustment before discharging to Greens Bayou. The portion of the sludge settled in the retention pond is periodically removed for off-site disposal.

4. Chemical Waste Treatment System Sludge (EPA Hazard Code E)

The sludge generated in the settling tank of the Chemical Waste Treatment System (treatment for demineralizer regenerant and inorganic metal cleaning waste) is pumped to the sand drying beds. The filtrate from the drying beds flows back to the retention ponds. The dried sludge is periodically removed for off-site disposal.

5. Waste Oil and Sludge (EPA Hazard Code T,O)

The waste oil and grease removed from the floor drainage treatment system and SPCC treatment system are collected in waste oil sumps. The collected waste oil and grease is periodically removed for off-site disposal. The oily sludge generated in the treatment system is dewatered in the sand beds (same sand bed used for chemical waste treatment system) and removed for off-site disposal.

6. Degreasing and Paint Solvent (EPA Hazard Code I,T)

The degreasing and paint solvent waste is collected in drums. These drums are stored for off-site disposal.

7. Asbestos in Insulation (EPA Hazard Code T)

Asbestos insulation waste will be placed in bags and wet down prior to off-site disposal.

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

000689

I. NAME OF INSTALLATION

T. H. Wharton Generating Station

II. INSTALLATION MAILING ADDRESS

00-083-7351

STREET OR P.O. BOX

3 P. O. Box 1700

CITY OR TOWN

4 Houston

ST.

Tx

ZIP CODE

77001

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

516301 West Montgomery Road

CITY OR TOWN

6 Houston

ST.

Tx

ZIP CODE

77001

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 McGuire, W. F. Manager Environ.

PHONE NO. (area code & no.)

713-481-7145

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 Houston Lighting and Power Company

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

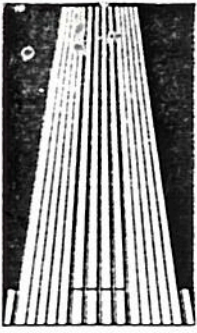
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

September 30, 1980

Executive Director
Texas Department of Water Resources
Attention: Permit Control & Records Section
P. O. Box 13087, Capitol Station
Austin, Texas 78711

SUBJECT: ADDITIONS AND MODIFICATIONS TO TDWR
HAZARDOUS WASTE PERMIT APPLICATIONS

Gentlemen:

As referenced in our August 15, 1980 submittal letter accompanying our fourteen permit applications, Houston Lighting and Power Company is hereby updating those applications with the enclosed additions and modifications (seven copies each).

Where appropriate, Attachments E and F, completed page 10 and other revised pages are included for the following applications:

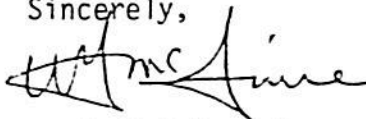
- S. R. Bertron Generating Station
- Cedar Bayou Generating Station
- H. O. Clarke Generating Station
- Deepwater Generating Station
- Gable Street Generating Station
- Greens Bayou Generating Station
- W. A. Parish Generating Station
- P. H. Robinson Generating Station
- Webster Generating Station
- T. H. Wharton Generating Station
- Energy Development Complex
- Underground Service Center
- South Houston Facility
- Houston Lighting and Power Service Area

SUBJECT: ADDITONS AND MODIFICATIONS TO TDWR
HAZARDOUS WASTE PERMIT APPLICATIONS

In addition the enclosed Attachments B and C complete the Energy Development Complex application.

Please contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "W. F. McGuire". The signature is stylized with a large, sweeping "M" and "G".

W. F. McGuire, Manager
Environmental Protection Department

BCN/dhj
Enclosures

TEXAS DEPARTMENT OF WATER RESOURCES
PERMIT APPLICATION
FOR
INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FACILITY

PART A - FACILITY BACKGROUND INFORMATION

APPL. NO.	10501
COUNTY-DIST.	Harris-7
RECEIVED AND FORWARDED BY	
ADM. REVIEW BY	
ADDITIONAL COMMENTS	
COPIES SENT:	(CHECK)
	DIST 7 ✓

I. GENERAL INFORMATION

A. Applicant: Houston Lighting & Power, T. H. Wharton Generating Station
(Individual, Corporation, or Other Legal Entity Name)

Address: P.O. Box 1700

City: Houston, State: Texas Zip Code: 77001

Telephone Number: (713) 481-7145

B. Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

W. F. McGuire, Manager, Environmental Protection Development
Houston Lighting & Power Company
P.O. Box 1700, Houston, Texas 77001
(713) 481-7145

R. M. McCuiston, Vice-President, Power System Development
Houston Lighting & Power Company
P.O. Box 1700
Houston, Texas 77001
(713) 228-9211

2. List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name: W. F. McGuire

Address: P.O. Box 1700

City: Houston, State: Texas Zip Code: 77001

Telephone Number: (713) 481-7145

RECEIVED
AUG 18 1980
PERMIT CONTROL
TDWR

3. List the applicant's authorized agent for service.

Name: J. R. Johnston

Address: P.O. Box 1700, 611 Walker

City: Houston, State: Texas Zip Code: 77001

Telephone Number: (713) 228-9211

C. Operator: Identify the entity who will conduct facility operations.
If same as applicant, state "same as applicant."

Name: Same as applicant

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

D. Ownership

1. Indicate the ownership status of the facility:

a. Private x

- | | |
|-----------------------------|----------|
| (1) Corporation | <u>x</u> |
| (2) Partnership | _____ |
| (3) Proprietorship | _____ |
| (4) Non-profit organization | _____ |

b. Public _____

- | | |
|---------------|-------|
| (1) Federal | _____ |
| (2) Military | _____ |
| (3) State | _____ |
| (4) Regional | _____ |
| (5) County | _____ |
| (6) Municipal | _____ |

c. Other (specify) _____

2. Is facility and site property owned by applicant?

x Yes _____ No

If you checked "no",

RECEIVED
AUG 18 1980
PERMIT CONTROL
TDWR

- a. Submit as an attachment a copy of the lease for use of said facility and/or site property, as appropriate; and
- b. Identify the facility owner. If same as applicant in Part A above, state "same as applicant." If different from the applicant, please note that the owner is required to sign the application on page 5.

Name: Same as applicant.

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Permit Application:

1. New X
2. Amendment _____ (TDWR Permit Number: _____)

F. Registration and Permit Information

1. Denote your TDWR Solid Waste Registration Number. If none, state "none."

31636

2. Indicate (by listing the permit number(s) in the appropriate column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit number, or the date of application, or "none".

Relevant Program and/or Law

	<u>Permit No.</u>	<u>Government Agency*</u>
a. Texas Solid Waste Disposal Act	<u>8-15-80</u>	<u>TDWR</u>
b. Wastewater disposal under the Texas Water Code	<u>01039</u>	<u>TDWR</u>
c. Underground injection under the Texas Water Code	<u>None</u>	<u>_____</u>
d. Texas Clean Air Act	<u>R-445,R-2094</u>	<u>TACB</u>
e. Texas Uranium Surface Mining & Reclamation Act	<u>None</u>	<u>_____</u>
f. Texas Surface Coal Mining & Reclamation Act	<u>None</u>	<u>_____</u>
g. Hazardous Waste Management program under the Resource Conservation and Recovery Act	<u>8-15-80</u>	<u>EPA</u>

h. UIC program under the Safe Drinking Water Act	<u>None</u>	<u> </u>
i. NPDES program under the Clean Water Act	<u>TX0006408</u>	<u> </u>
j. PSD program under the Clean Air Act	<u>None</u>	<u> </u>
k. Nonattainment program under the Clean Air Act	<u>None</u>	<u> </u>
l. National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act	<u>None</u>	<u> </u>
m. Ocean dumping permits under the Marine Protection Research and Sanctuaries Act	<u>None</u>	<u> </u>
n. Dredge or fill permits under section 404 of the Clean Water Act	<u>None</u>	<u> </u>
o. Other relevant environmental permits	<u>None</u>	<u> </u>

* Use the following acronyms for each agency as shown below:

TDWR = Texas Department of Water Resources
TACB = Texas Air Control Board
TRC = Texas Railroad Commission
TDH = Texas Department of Health
TDA = Texas Department of Agriculture
EPA = U. S. Environmental Protection Agency
CORPS = U. S. Army Corps of Engineers

G. Description of Business

1. Give a brief description of the nature of your business.

Electrical Power Generation

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

4911 Electrical Power Services

803241

TEXAS DEPARTMENT OF WATER RESOURCES

AUSTIN, TEXAS

RECEIPT NO.

Suspense Fund 900

Special Fund 41

FY _____ CC _____

FY_____ CC

Sales Tax Fund 961

Special Fund 123

FY _____ CC _____

FY_____ CC_____

General Rev. Fd 1, Unappropriated

Special Fund 153

FY _____ CC _____

FY_____ CC_____

General Rev. Fd 1, Appropriated

Special Fund 158

FY 80 CC 11.368 70.00

FY _____ CC _____

Comptr. Rev. Code 3154

Source of Funds

Refund on War#

REMARKS: Permit Appl. - Jodie Wash - Passage

Type of Remittance Cashier's Pk # 395048 Received by WJ
 S. B. Burton Men. Sec., Cedar Bayou Men. Sec., H. C. Clark Men. Sec., Longview Men. Sec.,
 Hobbs Men. Sec., Kreiner Bayou Men. Sec., Will Parish Men. Sec., J. H. Robinson
 Men. Sec., Webster Men. Sec., J. H. Cochran Men. Sec., Emergency Relief Compt.,
 Underground Service Center, South Houston Facility.

I, R. M. McCuistion, Vice-President
(Name) (Title)

I, _____, _____
(Name) (Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete.

Signature: R. M. McCuistion, Date: 8-15-80

Signature: _____, Date: _____

SUBSCRIBED AND SWORN to before me by the said R. M. McCuistion

_____ on this 15th day of August, 19 80.

My commission expires on the 7th day of March, 19 84.

Debra R. Blackburn
Notary Public in and for

Harris County, Texas
FEE PAID

II. SITE BACKGROUND INFORMATION

A. Location of Site

1. Facility Name: T. H. Wharton Generating Station

Street Address, if available: 16301 W. Montgomery (FM-149)

Houston, Texas County: Harris

2. Are your waste management operations within the extraterritorial jurisdiction of a municipality?

X Yes No

If you checked "yes," what municipality? Houston

3. Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.

See item 4 below

4. Detail the access routes from the nearest U.S. or State Highway to the facility site.

Approximately 8 miles northwest of the intersection of I-45 and FM-149.

5. Submit as "Attachment A" a United States Geological Survey (USGS), 7½ minute quadrangle map. Indicate on this map the location of the site and the land use patterns of the areas within 1 mile (1.6 km) of the site boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map with sufficient scale to adequately show the site location and surrounding land use patterns.

6. a. Submit as "Attachment B" a map indicating the boundaries of all adjacent parcels of land, and a list of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map or drawing with a scale adequate enough to show the cross-referenced affected landowners.

- b. Indicate from what source(s) the names and addresses of persons identified as affected were obtained.

City _____
County X _____
School District _____
Water District _____
Abstract Co. _____
Other (specify) _____

7. Enter the geographical coordinates of the site:

Latitude: N29 deg 56 min 28 sec
Longitude: W95 deg 31 min 54 sec

8. Is the facility located on Indian lands? Check one:

 Yes X No

B. Legal Description of Site

Submit as "Attachment C" a legal description of the entire tract of land upon which the waste management operations referred to in this permit application occur or will occur.

C. Site Environmental and Technical Information

1. Climatic and Hydrologic

- a. Is any portion of your waste management facility site (including proposed, active, and inactive portions) subject to flooding from adjacent or nearby surface water bodies under the following conditions?

<u>24-hr Rainfall Event</u>	<u>Yes</u>	<u>No</u>
5-year	<u> </u>	<u>X</u>
50-year	<u> </u>	<u>X</u>
100-year	<u> </u>	<u>X</u>

- b. Are there any producing groundwater wells on your site property?

X Yes No

If you checked "yes,"

(1) Indicate the number of such wells: eight (8), and

(2) Indicate the corresponding water uses below:

(a) Industrial uses:

Cooling water X
Process water X
Fire-control water X

(b) Potable (drinking) water X

(c) Agricultural uses:

Irrigation water for livestock food crops or grazing
land _____
Livestock watering _____
Irrigation water for human food crops _____

c. Are any adjacent or nearby surface waters utilized by the applicant?

_____ Yes X No

If you checked "yes," indicate the corresponding water uses below:

(1) Industrial uses:

Cooling water _____
Process water _____
Fire-control water _____

(2) Potable (drinking) water _____

(3) Agricultural uses:

Irrigation water for livestock food crops or grazing
land _____
Livestock watering _____
Irrigation water for human food crops _____

2. Site Land Use and Subsidence Information

a. Is any portion of the overall site property utilized for agricultural purposes?

_____ Yes X No

If you checked "yes," indicate the corresponding uses below:

(1) Grazing _____
(2) Livestock food crop _____
(3) Human food crop _____

If you checked no. (2) or (3), specify the types of crops grown. _____

b. Is any portion of the overall site property subject to land subsidence?

X Yes _____ No

If you checked "yes," estimate the magnitude of the greatest subsidence that has occurred (in units of feet). 0.6 ft (1973-1978)

III. WASTES AND WASTE MANAGEMENT

A. Waste Generation and Management Activities

Is any hazardous industrial solid waste (see Title 40, Code of Federal Regulations, Part 261) presently or proposed to be generated at your facility?

☒ Yes ☐ No

If you checked "no," go to Section III.B.2. below.

If you checked "yes," answer the following question.

1. Are you presently registered with TDWR as a solid waste generator?

☒ Yes ☐ No

If you checked "no," contact the Solid Waste Section of TDWR in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

If you checked "yes," go to Section I of your Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1 below, listing all hazardous wastes and all mixtures containing any hazardous waste which are presently or proposed to be generated at your facility. (see 40 CFR 261.31-33), attaching additional copies as necessary.

In this table, "TDWR Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TDWR, enter "NA" for TDWR Sequence Number and TDWR Waste Code Number).

For the EPA Hazard Code and EPA Hazardous Waste Numbers, see 40 CFR 261.30-33. For annual quantity, provide the amount in units of pounds (as generated) for each waste and/or waste mixture.

Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

B. Waste Management Facilities Summary

1. For each waste and waste mixture listed in Table III-1 that is presently or proposed to be managed on-site, provide the summary sheet shown in Table III-2 (Note: you must make copies of Table III-2 and submit the completed set of tables as "Attachment D").

Table III-1 Generation, Storage, and Management Activities

Table III-1 Generation, Storage, and Management Activities

Verbal Description of Waste	TOWN Sequence Number	TOWN Waste Code Number	EPA Hazard Code	EPA Hazardous Waste No.	Waste Management Activities (Check applicable items)		Annual Quantity Generated (lbs)	SIC Code and Process
					Storage ¹	On Site Processing ²		
Mineralizer Regenerant	NA	NA	C	D002	X	X	408,000,000*	
Mineralizer Regenerant	2	140540	E		X		**	
Organic Acids	NA	NA	E, C	D007, D002	X	X	18,880,000*	
Organic Sludge	2	140540	E		X		**	
Organic Acids	NA	NA	E		X	X	20,820,000*	
Organic Sludge	NA	148990	E		X		**	
Chemical Waste Treatment System Sludge	NA	NA	E	D007	X	X	137,500	
Waste Oil & Sludge	1	110450	T, O		X	X	57,050	
Greasing and Solvents	NA	NA	I, T	F003 F005	X		10,800	
Asbestos in Insulation	NA	170750	T	U013	X	X	(***)	
Untreated amounts, normally treated and discharged under wastewater permits.							**	

* Unknown, small amount.

** Actual percent asbestos content is variable but small

¹ "Storage" means the interim containment or control of waste after generation and prior to ultimate disposal.

² "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste so as to render such waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, ship, pipeline, or other means.

2. Has the applicant at any time conducted the on-site storage, processing, or disposal of industrial solid waste now identified or listed as hazardous waste?

 X Yes No

If you checked "yes," complete Table III-3 indicating the hazardous industrial solid waste management facility components which were once utilized at your plant site but are no longer in service (i.e., inactive facility components).

If you checked "no," and if no hazardous industrial solid waste is presently or proposed to be generated or managed at your facility, then you need not file this permit application. Otherwise, proceed with application form.

3. For each facility component indicated in Table III-2 (Attachment D) and Table III-3, complete the following Table III-4 attaching additional copies as necessary. Enter the name of each facility component as specified in the earlier tables.

Give the design capacity of each facility component in any of the units shown. In the case of inactive facilities for which design details are unavailable, an estimate of the design capacity is sufficient.

Please note that each facility component should be described in your own words on the line provided for "verbal description."

4. Provide an estimate of the total weight (lbs) of hazardous industrial solid waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Facilities and Components

1. Submit as "Attachment E" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile (and only one mile) beyond the property boundaries of the overall plant site, depicting the following:
 - a. The approximate boundaries of the site (described in Section II B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed facility component (see Tables III-2 and III-3 for facility components). Each depicted area should be labeled to identify the facility component(s), component status (i.e., active, inactive, or proposed), and area size in acres.

Table III-3 Inactive Hazardous Industrial Solid Waste Management Facility Components

No inactive facility components

Indicate the inactive facility components which were used for storage/processing/disposal of hazardous wastes or mixtures containing any hazardous waste by entering the number of such facility components in the space provided.

- | | |
|--|--|
| <input type="checkbox"/> Lagoon/Pond (lined) | <input type="checkbox"/> Landspreading Area |
| <input type="checkbox"/> Basin (earthen, above-grade lined) | <input type="checkbox"/> Spray Irrigation Area |
| <input type="checkbox"/> Basin (earthen, above-grade unlined) | <input type="checkbox"/> Flood Irrigation Area |
| <input type="checkbox"/> Basin (earthen, below-grade lined) | <input type="checkbox"/> Septic Tank/Drain Field |
| <input type="checkbox"/> Basin (earthen, below-grade unlined) | <input type="checkbox"/> Injection Well |
| <input type="checkbox"/> Basin (concrete, above-grade lined) | <input type="checkbox"/> Tank (surface storage) |
| <input type="checkbox"/> Basin (concrete, above-grade unlined) | <input type="checkbox"/> Tank (sub-surface storage) |
| <input type="checkbox"/> Basin (concrete, below-grade lined) | <input type="checkbox"/> Tank (surface processing) |
| <input type="checkbox"/> Basin (concrete, below-grade unlined) | <input type="checkbox"/> Tank (sub-surface processing) |
| <input type="checkbox"/> Basin (other) | <input type="checkbox"/> Tank (other) |
| <input type="checkbox"/> Pit (lined) | <input type="checkbox"/> Drum Storage Area (open) |
| <input type="checkbox"/> Pit (unlined) | <input type="checkbox"/> Drum Storage Area (enclosed) |
| <input type="checkbox"/> Incinerator | <input type="checkbox"/> Drum Storage Area (other) |
| <input type="checkbox"/> Open Controlled Incineration Area | <input type="checkbox"/> Bulk Storage Area (open) |
| <input type="checkbox"/> Boiler (energy-producing) | <input type="checkbox"/> Bulk Storage Area (enclosed) |
| <input type="checkbox"/> Landfill (sanitary) | <input type="checkbox"/> Bulk Storage Area (other) |
| <input type="checkbox"/> Landfill (surface, open) | <input type="checkbox"/> Other (specify _____) |
| <input type="checkbox"/> Landfill (other) | _____) |

Table III-4 Hazardous Waste Facility Components List

Facility Component		Status		Design Capacity		Number of Years Utilized	Date in Service
Name	TDWR Seq. No.	Inactive	Active	Proposed	(cu yds)	(gal)	(lbs)
Lagoon/Pond (lined)			X			1,000,000	1 1979
Verbal Description: Clay lined pond for the collection & equalization of demineralizer regeneration wastes prior to treatment. Sludge accumulated at the pond bottom is periodically removed for off-site disposal.							
*Tank (Surface Processing)			X			63,300	1 19
Verbal Description: Treatment system (Surface processing) for neutralization consists of One (1) mixing chamber (3000 gallon) one (1) flocculation chamber (6,000 gallon), one (1) settling chamber (54,000 gallon) and one (1) pH readjustment chamber (3000 gallon)							
Lagoon/Pond (lined)			X			1,000,000	1 1979
Verbal Description: Clay lined pond for the collection of metal cleaning inorganic acid wastes from boiler & equipment cleaning operations prior to treatment. Sludge accumulated at the pond bottom is periodically removed for off-site disposal							
Lagoon/Pond (lined)			X			4,500,000	1 1979
Verbal Description: Clay lined pond for the collection of metal cleaning organic acids from boiler cleaning operations prior to off-site disposal. Sludge accumulated at the pond bottom is periodically removed for off-site disposal.							
Basin (earthen, below-grade lined)			X			576 (ea)	1 1979
Verbal Description: Two clay lined sand drying beds for the collection & processing of sludge dewatering from the chemical waste treatment system and oily waste treatment system. Dried sludge is periodically removed for off-site disposal.							
Basin (concrete, below-grade lined)			X			3,000	2 1978
Verbal Description: Tank used for the collection of waste oil & sludge which is accumulated from the oily waste treatment system. This waste is periodically trucked off-site for disposal.							

*Chemical Waste Treatment System.

Table III Facility Waste Facility Components List

Facility Component	Seq. No.	Status		Design Capacity		Number of Years Utilized	Date in Service
		Active	Inactive	(cu yds)	(gal)	(lbs)	
Other		X		NA	NA	NA	NA
Verbal Description: Asbestos used for insulation will be placed in bags and wet down prior to off-site disposal.							
Actual percent asbestos content is variable but small.							
Drum storage area (other)		X		NA	NA	NA	NA
Verbal Description: Drum storage area for the collection of waste solvents used in degreasing and painting operations prior to off-site disposal.							
Verbal Description:							
Verbal Description:							
Verbal Description:							
Verbal Description:							
Verbal Description:							

- b. The overall facility and all surface intake and discharge structures;
 - c. All injection wells where liquids are injected underground;
 - d. All known monitor wells and boreholes within the property boundaries of the overall plant site; and
 - e. All wells, springs, other surface water bodies, and drinking water wells within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).
2. Submit as "Attachment F" photographs which clearly delineate all hazardous waste facility structures and storage, processing, and disposal areas, as well as sites of future storage, processing, and disposal areas.

D. Flow Diagram/Description

Show as "Attachment G" process flow diagrams or step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

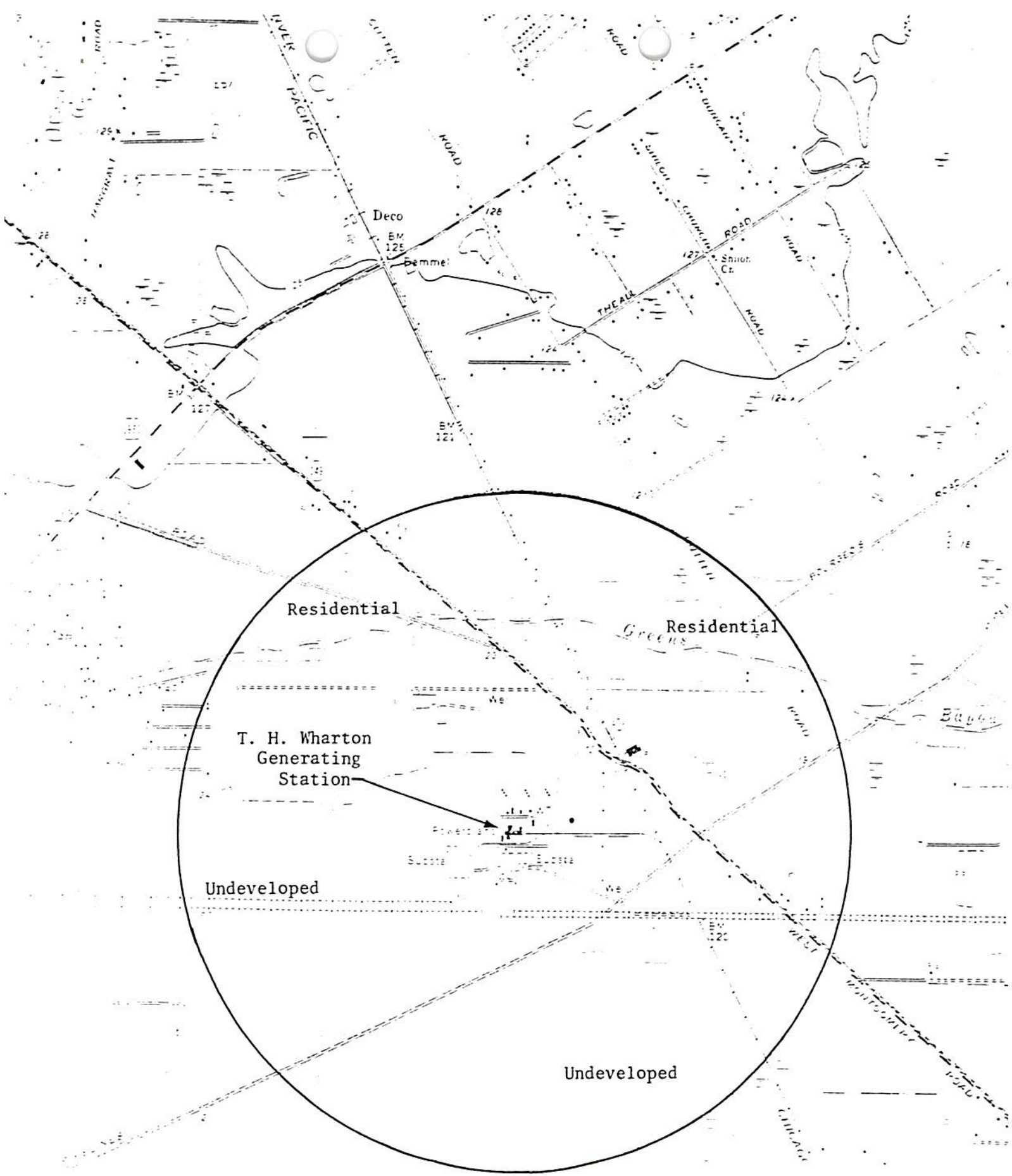
1. Originating point of each waste and waste classification code;
2. Means of conveyance utilized in every step of the process flow;
3. Name and function of each facility component through which the waste passes;
4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

IV. INDEX OF ATTACHMENTS

List and index below all attachments to this application and indicate if included or not included:

<u>Item</u>	<u>Mandatory Attachments</u>	<u>Attachment</u>	<u>Included</u>	<u>Not Included</u>
II.A.5.	USGS map	<u>A</u>	<u>X</u>	—
II.A.6.a.	Affected landowners	<u>B</u>	<u>X</u>	—
II.B.	Site legal description	<u>C</u>	<u>X</u>	—
III.B.1.	Hazardous waste facility component summary sheets	<u>D</u>	<u>X</u>	—
III.C.1.	Facility boundaries and adjacent waters map	<u>E</u>	—	<u>X</u>
III.C.2.	Photographs	<u>F</u>	—	<u>X</u>
III.D.	Process flow diagram/description	<u>G</u>	<u>X</u>	—
<u>Other Attachments as Required</u>				
I.D.2.a.	Lease	<u>NA</u>	—	—
III.A.2.	Additional generated waste list (Table III-1)	<u>NA</u>	—	—
III.B.3.	Additional hazardous waste facility components list (Table III-4)	—	<u>X</u>	—

ATTACHMENT A



Attachment A

T. H. Wharton
Houston Lighting & Power Co.

USGS- Satsuma, Texas 1916-70

ATTACHMENT B

ATTACHMENT B
T. H. WHARTON POWER PLANT
ADJOINING OWNERSHIP

SOURCE: Harris County Tax Roll

<u>PARCEL NO.</u>	<u>NAME & ADDRESS OF OWNER</u>
1	William M. Rice University P. O. Box 2666 Houston, Texas 77001
2	Mahan-Thomas No. 101 14637 Pebble Bend Houston, Texas 77068
3	Silco 135, Ltd. c/o Clarke & Co. 2510 Times Blvd. Houston, Texas 77005
4	Thurmond A. Williamson P. O. Box 57105 Dallas, Texas 75207
5	Joe Rutland CSA Ltd., Inc. P. O. Box 38073 Houston, Texas 77088
6	Kurth Walker Lumber Co. P. O. Box 40158 Houston, Texas 77040
7	Lone Star Plywood & Door Corp. P. O. Box 607 Irving, Texas 75060
8	Mrs. Pete Terpestra 14960 Wunderlich Houston, Texas 77069
9	Alice T. Ripley 448 W. 28th Houston, Texas 77008
10	United Texas Transmission Co. #3356 P. O. Box 1478 Houston, Texas 77001
11	E. G. McMillan, et al (½ interest) 8989 Westheimer, Suite 200 Houston, Texas 77063 Herb Handley (½ interest) 5505 Russett Houston, Texas 77042
12	Colonial Savings Association P. O. Box 36443 Houston, Texas 77036
13	E. G. McMillan, et al (½ interest) 8989 Westheimer, Suite 200 Houston, Texas 77063 Herb Handley (½ interest) 5505 Russett Houston, Texas 77042

ATTACHMENT B
T. H. WHARTON POWER PLANT
ADJOINING OWNERSHIP

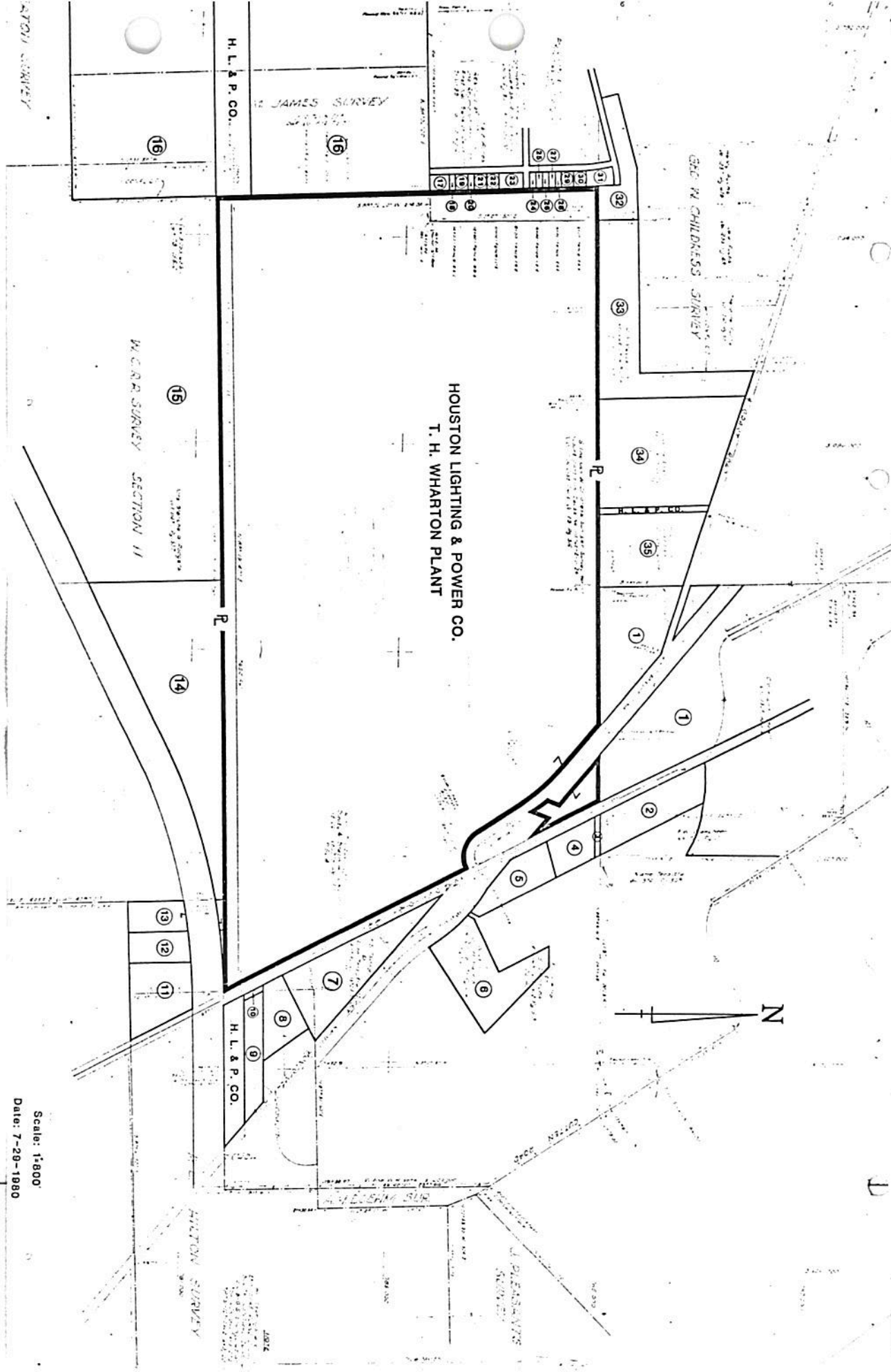
SOURCE: Harris County Tax Roll

<u>PARCEL NO.</u>	<u>NAME & ADDRESS OF OWNER</u>
14	Parkwood #102, Ltd. Attn: J. Lagoata 2737 Buffalo Spdwy Houston, Texas 77098
15	The Alfa Co. (1/3 interest) c/o William G. Lawhon 1100 Esperson Bldg. Houston, Texas 77002 N. V. Doral (2/3 interest) c/o William G. Lawhon 1100 Esperson Bldg. Houston, Texas 77002
16	Ben Taub (1/5 interest) 909 Franklin Houston, Texas 77002 Mary Taub Hibbert (1/5 interest) c/o L. G. Walker & Assoc. 546 The Main Bldg. Houston, Texas 77002 Rosa Kahn (1/5 interest) T/A 46827-01 c/o Texas Commerce Bank NA P. O. Box 2558 Houston, Texas 77001 Hilda Raphael Schwartz (1/5 interest) 2350 Braeswood Blvd. Houston, Texas 77030 Henry J. N. Taub (1/10 interest) 909 Franklin Houston, Texas 77002 John Ben Taub (1/10 interest) P. O. Box 27423 Houston, Texas 77027
17	Jesse Hickman 3777 Arnold Houston, Texas 77005
18	William E. Goad 11714 Rockland Houston, Texas 77064
19	Minor E. Kerr 11718 Rockland Houston, Texas 77064
20	Eduardo E. Garza 11806 Rockland Houston, Texas 77064
21	Charles Newton 1539 W. 23rd Houston, Texas 77008
22	R. L. Walton 414 Palmyra Houston, Texas 77022

ATTACHMENT B
T. H. WHARTON POWER PLANT
ADJOINING OWNERSHIP

SOURCE: Harris County Tax Roll

<u>PARCEL NO.</u>	<u>NAME & ADDRESS OF OWNER</u>
23	W. W. Campbell 11902 Rockland Houston, Texas 77064
24	W. W. Campbell, et ux 11902 Rockland Houston, Texas 77064
25	Willie Wayne Campbell 11902 Rockland Houston, Texas 77064
26	Clyde L. Byrne 213 W. 18th Houston, Texas 77008
27	Anastacia Garza 11914 Rockland Houston, Texas 77064
28	T. C. Stallones 14718 Pine Warbler Tomball, Texas 77376
29	Paul J. Waldrop Rt. 12, Box 1854-B Houston, Texas 77040
30	Rex R. Michael, et ux 12010 Rockland Houston, Texas 77064
31	Charles R. Blunt 8535 Shoal Creek Houston, Texas 77064
32	C. C. McMillan c/o Franklin, Kelly & Graham Cotton Exchange Bldg. Houston, Texas 77002
33	Joe P. Klores Rt. 2, Box 114 Alto, Texas 75925
34	Larry R. Womack 3103 Harrisburg Houston, Texas 77003
35	Delta Engineering Co. c/o Ray Arterburn 6906 Atkiell, Suite 209 Houston, Texas 77081



Scale: 1"=600'
Date: 7-29-1980

ATTACHMENT C

ATTACHMENT "C"

LEGAL DESCRIPTION OF
T. H. WHARTON POWER PLANT

Those certain tracts or parcels containing 569.443 acres of land located in the G. W. Childress Survey, A-217, and W. H. York Survey, A-943, Harris County, Texas, being out of 574.612 acres conveyed to Houston Lighting & Power Company by the following deeds:

	<u>GRANTOR</u>	<u>DATE</u>	<u>VOL/PAGE</u>	<u>ACREAGE</u>
1)	F. S. Clancy	05-04-45	1380/165	26.520
2)	F. S. Clancy	12-13-48	1864/29	536.580
3)	F. S. Clancy	07-26-50	2132/164	11.512

Less and except 5.169 acres conveyed by Houston Lighting & Power Company as follows:

	<u>GRANTEE</u>	<u>DATE</u>	<u>VOL/PAGE</u>	<u>ACREAGE</u>
1)	State of Texas	08-19-60		5.169

ATTACHMENT D

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste

Demineralizer Regenerant

Process (see last column in Table III-1)

Water Treatment

TDWR Sequence Number of Waste (if assigned)

NA

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

☐ Lagoon/Pond (unlined)

☐ Landfarm

☒ 1 Lagoon/Pond (lined)

☐ Landspreading Area

☐ Basin (earthen, above-grade lined)

☐ Spray Irrigation Area

☐ Basin (earthen, above-grade unlined)

☐ Flood Irrigation Area

☐ Basin (earthen, below-grade lined)

☐ Septic Tank/Drain Field

☐ Basin (earthen, below-grade unlined)

☐ Injection Well

☐ Basin (concrete, above-grade lined)

☐ Tank (surface storage)

☐ Basin (concrete, above-grade unlined)

☐ Tank (sub-surface storage)

☐ Basin (concrete, below-grade lined)

☒ * 1 Tank (surface processing)

☐ Basin (concrete, below-grade unlined)

☐ Tank (sub-surface processing)

☐ Basin (other)

☐ Tank (other)

☐ Pit (lined)

☐ Drum Storage Area (open)

☐ Pit (unlined)

☐ Drum Storage Area (enclosed)

☐ Incinerator

☐ Drum Storage Area (other)

☐ Open Controlled Incineration Area

☐ Bulk Storage Area (open)

☐ Boiler (energy-producing)

☐ Bulk Storage Area (enclosed)

☐ Landfill (sanitary)

☐ Bulk Storage Area (other)

☐ Landfill (surface, open)

☐ Other (specify _____)

☐ Landfill (other)

* Chemical Waste Treatment System

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	Demineralizer Regenerant Inorganic Sludge
Process (see last column in Table III-1)	Water Treatment
TDWR Sequence Number of Waste (if assigned)	2

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> 1 Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>periodically removed</u> <u>for off-site disposal</u>)
<input type="checkbox"/> Landfill (other)	

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Metal Cleaning</u>
	<u>Inorganic Acids</u>
Process (see last column in Table III-1)	<u>Boiler & equipment cleaning operations</u>
TDWR Sequence Number of Waste (if assigned)	<u>NA</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input checked="" type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

*Chemical Waste Treatment System

Verbal Description of Waste

Metal Cleaning & Other Inorganic Sludge
Boiler & Equipment Cleaning Operations
and Boiler Blowdown

Process (see last column in Table III-1)

TDWR Sequence Number of Waste (if assigned)

NA

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

☐ Lagoon/Pond (unlined)☐ Landfarm☒ 1 Lagoon/Pond (lined)☐ Landspreading Area☐ Basin (earthen, above-grade lined)☐ Spray Irrigation Area☐ Basin (earthen, above-grade unlined)☐ Flood Irrigation Area☐ Basin (earthen, below-grade lined)☐ Septic Tank/Drain Field☐ Basin (earthen, below-grade unlined)☐ Injection Well☐ Basin (concrete, above-grade lined)☐ Tank (surface storage)☐ Basin (concrete, above-grade unlined)☐ Tank (sub-surface storage)☐ Basin (concrete, below-grade lined)☐ Tank (surface processing)☐ Basin (concrete, below-grade unlined)☐ Tank (sub-surface processing)☐ Basin (other)☐ Tank (other)☐ Pit (lined)☐ Drum Storage Area (open)☐ Pit (unlined)☐ Drum Storage Area (enclosed)☐ Incinerator☐ Drum Storage Area (other)☐ Open Controlled Incineration Area☐ Bulk Storage Area (open)☐ Boiler (energy-producing)☐ Bulk Storage Area (enclosed)☐ Landfill (sanitary)☐ Bulk Storage Area (other)☐ Landfill (surface, open)☒ 1 Other (specify periodically removed
for off-site disposal)☐ Landfill (other)

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Metal Cleaning</u> <u>Organic Acids</u>
Process (see last column in Table III-1)	<u>Boiler Cleaning Operations</u>
TDWR Sequence Number of Waste (if assigned)	<u>NA</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> 1 Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>off-site treatment</u>)
<input type="checkbox"/> Landfill (other)	<input type="checkbox"/> _____)

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	Metal Cleaning
	Organic Sludge
Process (see last column in Table III-1)	<u>Boiler Cleaning Operations</u>
TDWR Sequence Number of Waste (if assigned)	<u>NA</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> 1 Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>periodically removed</u>
<input type="checkbox"/> Landfill (other)	<u>for off-site disposal</u>)

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	Chemical Waste Treatment System Sludge
Process (see last column in Table III-1)	Sludge generated from wastewater treatment processes.
TDWR Sequence Number of Waste (if assigned)	NA

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input checked="" type="checkbox"/> 4 Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>dried sludge periodically</u>
<input type="checkbox"/> Landfill (other)	<u>removed for off-site disposal)</u>

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Waste Oil and Sludge</u>
Process (see last column in Table III-1)	<u>Oil & sludge from oily waste treatment system</u>
TDWR Sequence Number of Waste (if assigned)	<u>1</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<u>2</u> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<u>1</u> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<u>1</u> Other (specify <u>dewatered sludge and</u>
<input type="checkbox"/> Landfill (other)	<u>waste oil are trucked off-site for disposal)</u>

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste

Degreasing and Paint Solvent

Process (see last column in Table III-1)

Degreasing and Painting Operations

TDWR Sequence Number of Waste (if assigned)

NA

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input checked="" type="checkbox"/> 1 Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>drums are trucked off-site</u>
<input type="checkbox"/> Landfill (other)	<u>for disposal</u> ;

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	Asbestos
Process (see last column in Table III-1)	Insulation
TDWR Sequence Number of Waste (if assigned)	NA

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

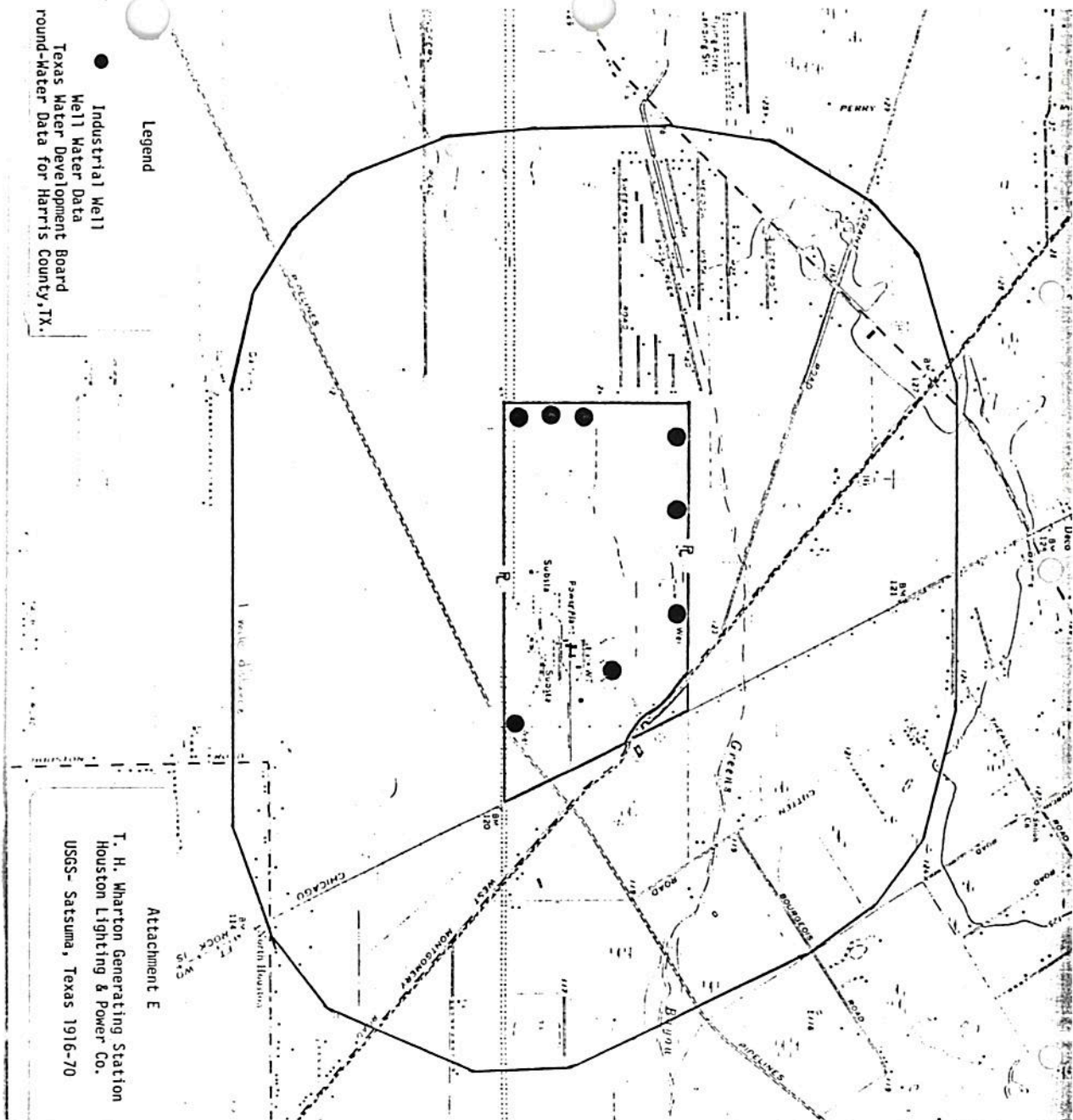
<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> Other (specify <u>will be placed in bags and wet down prior to off-site disposal.</u>)
<input type="checkbox"/> Landfill (other)	

ATTACHMENT E

● Industrial Well
● Well Water Data
Texas Water Development Board
Ground-Water Data for Harris County, TX.

Legend

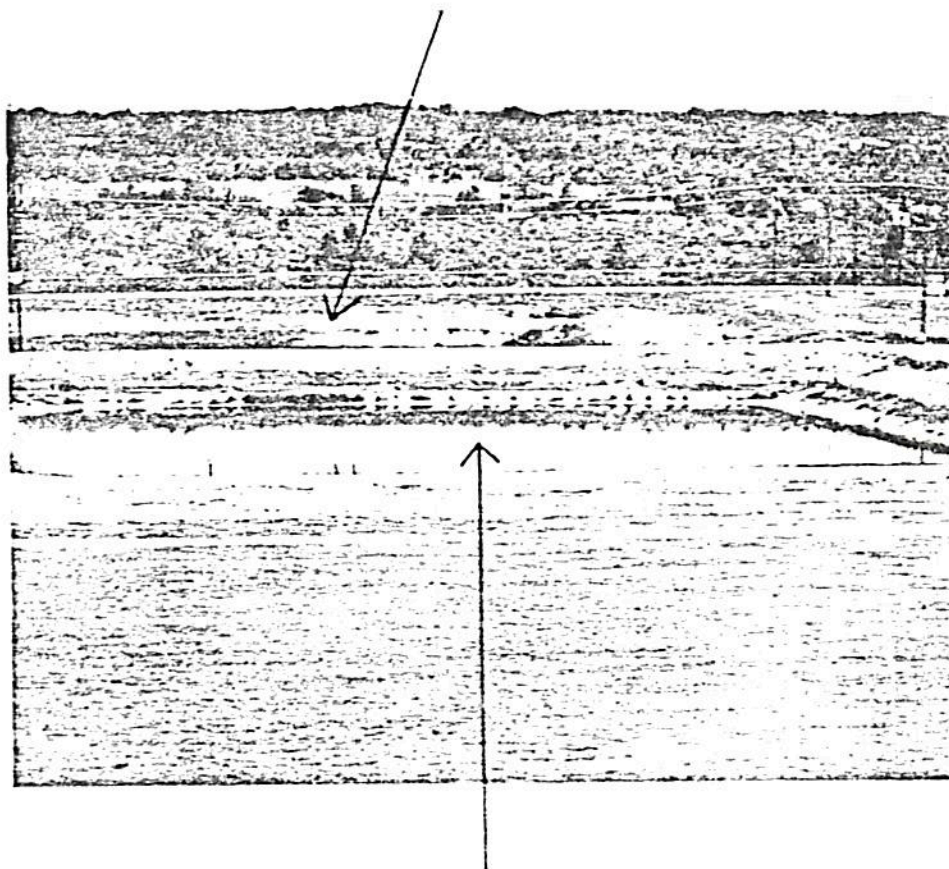
Attachment E
T. H. Wharton Generating Station
Houston Lighting & Power Co.
USGS - Satsuma, Texas 1916-70



ATTACHMENT F

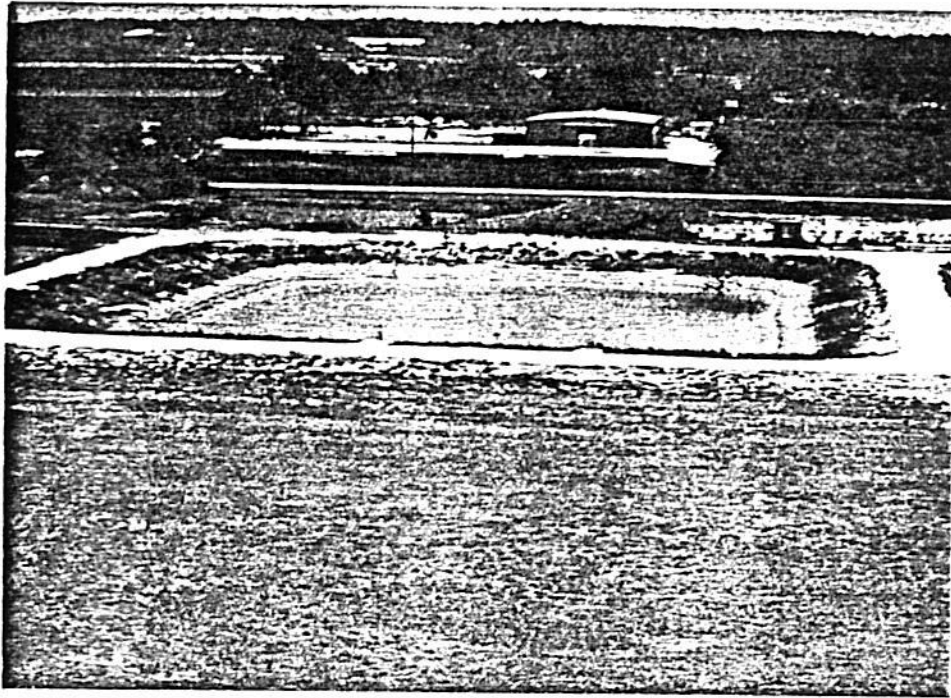
T. F. WHARTON GENERATING STATION

METAL CLEANING
ORGANIC ACIDS
COLLECTION POND

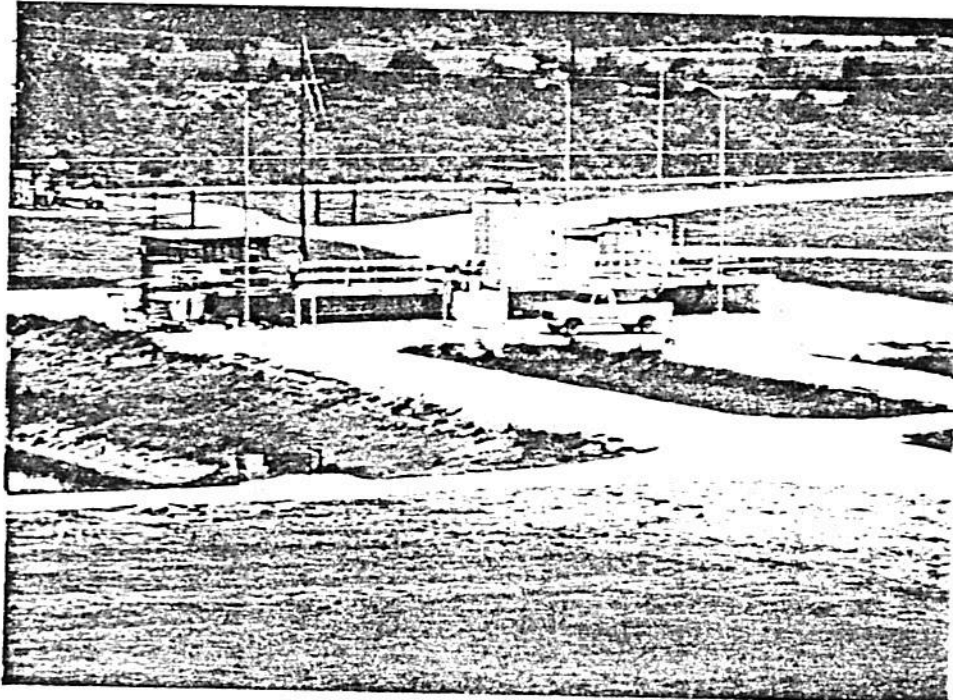


METAL CLEANING
INORGANIC ACIDS
COLLECTION POND

T. H. WHARTON GENERATING STATION

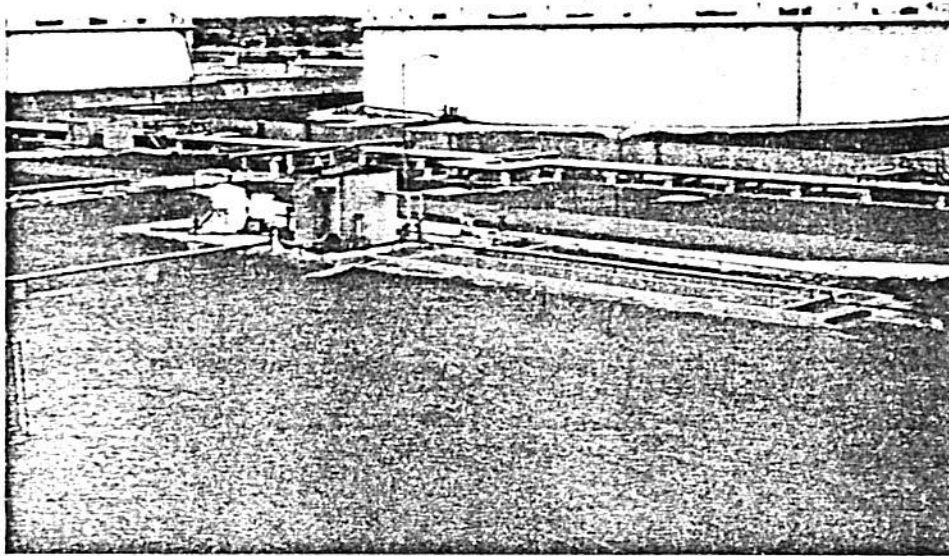


DEMINERALIZER REGENERANT
COLLECTION POND

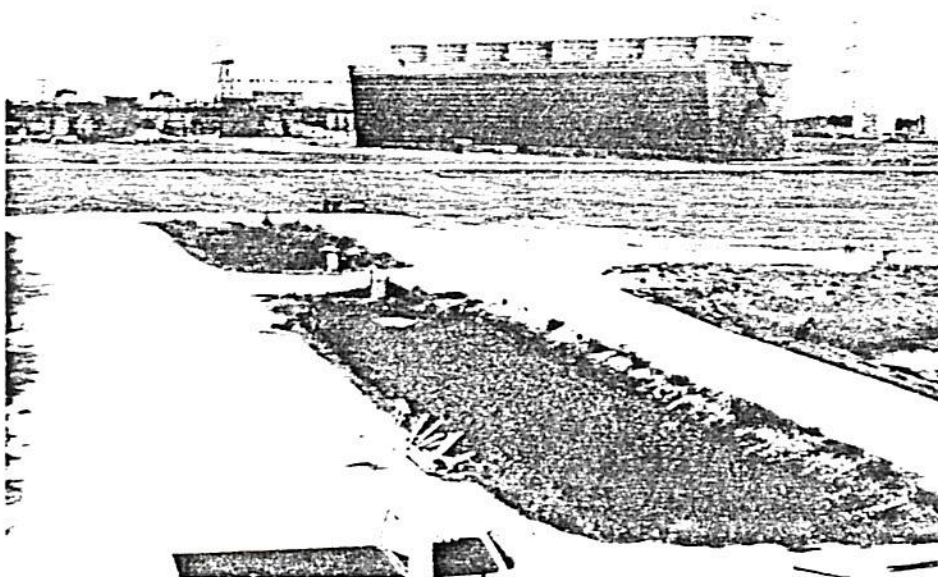


CHEMICAL WASTE
TREATMENT SYSTEM

T. H. WHARTON GENERATING STATION



WASTE OIL & SLUDGE
COLLECTION FACILITY



SAND DRYING BEDS

ATTACHMENT G

Part A, Permit Process Internal Checklist

HOUSTON LIGHTING & POWER

ID Number TXD000837351 Inst Name T.H. WHARTON GENERATING STATION

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid Prm/g Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	<u>MS</u>	___	
3	Form 1 received?	<u>MS</u>	___	
1	Form 3 received?	<u>MS</u>	___	
1 & 3	Postmarked on or before November 19, 1980?	<u>MS</u>	___	
3	Date of operation entered?	<u>MS</u>	___	
3	Date of operation on or before November 19, 1980?	<u>MS</u>	___	
Notif. record	Notifier?	<u>MS</u>	___	
"	Notified on or before August 18, 1980?	<u>MS</u>	___	
1	Form 1, XIII B signed?	<u>MS</u>	___	
3	Form 3, IX B Signed?	<u>MS</u>	___	

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: _____)

PHASE TWO

1	Unsure if regulated or non-regulated?	___	<u>GT</u>
3	New facility?	___	<u>GT</u>
1 & 3	Core items missing? If Yes, indicate which items: Facility name___; location___; mail address___; operator info___; certification___; process info___; waste info___; owner___; sigs___.		

PHASE THREE

1 & 3	Non-core items missing? If Yes, indicate which items: Maps___; photos___; drawings___; lat/long___. Other observations and comments:
-------	--

Received Date Stamp

80-11-19

(Stamp forms also)

Log out/Log in
on reverse side.

FORM
1
GENERAL



U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
 Consolidated Permits Program
 (Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

FTX D 0 0 0 8 3 7 3 5 1 3 D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP T. H. WHARTON GENERATING STATION

IV. FACILITY CONTACT

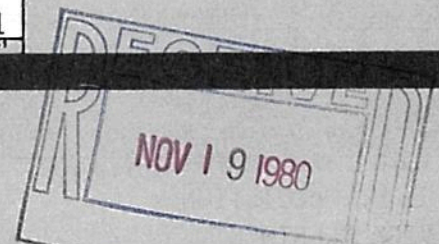
A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 M. C. GUIRE, W. F. MANAGER ENVIRON	7 1 3 4 8 1 7 1 4 5

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 P.O. BOX 1700	H O U S T O N	T X	7 7 0 0 1

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5 16301 W. MONTGOMERY	H A R R I S	H O U S T O N	T X	7 7 0 6 4	



FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER														
			S F T X D 0 0 0 8 3 7 3 5 1 3 1														
			1 2 13 14 15														

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
A	8 0 1 1 1 9	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

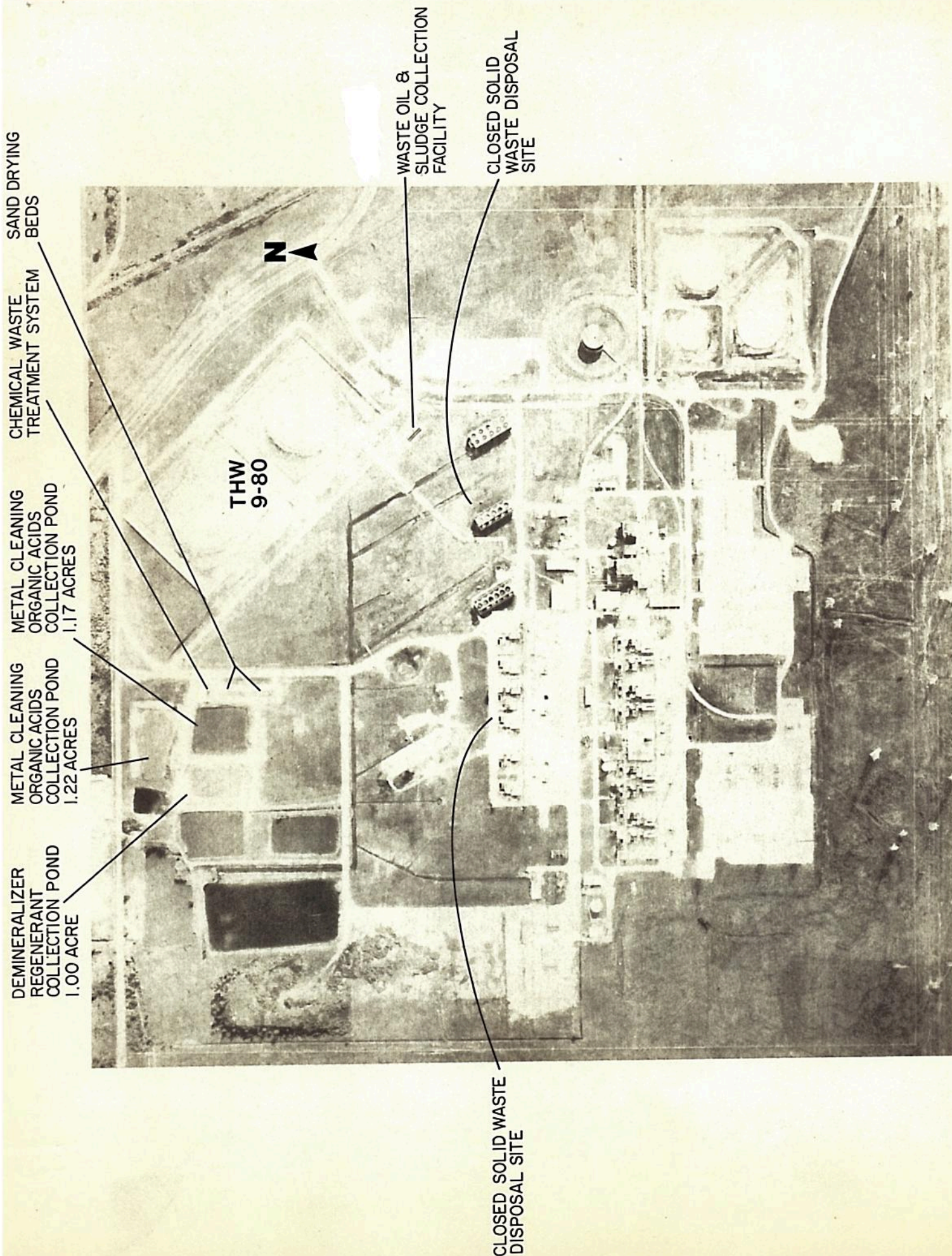
PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)				1. AMOUNT	
X-1	S 0 2	600	G	5	T 0 2	24,000.000	U
X-2	T 0 3	20	E	6	S 0 2	3,000.000	G
1	S 0 4	6,000,000.000 1,000,000.000	G	7	T 0 1	1,440,000	U
2	S 0 4	1,000,000.000	G	8	S 0 1	1,801.000 1,800	G
3	T 0 1	1,699,200.000 10,800.000	U E	9	S 0 1	Unknown, small amount	G
4	S 0 4	4,500,000.000	G	10			

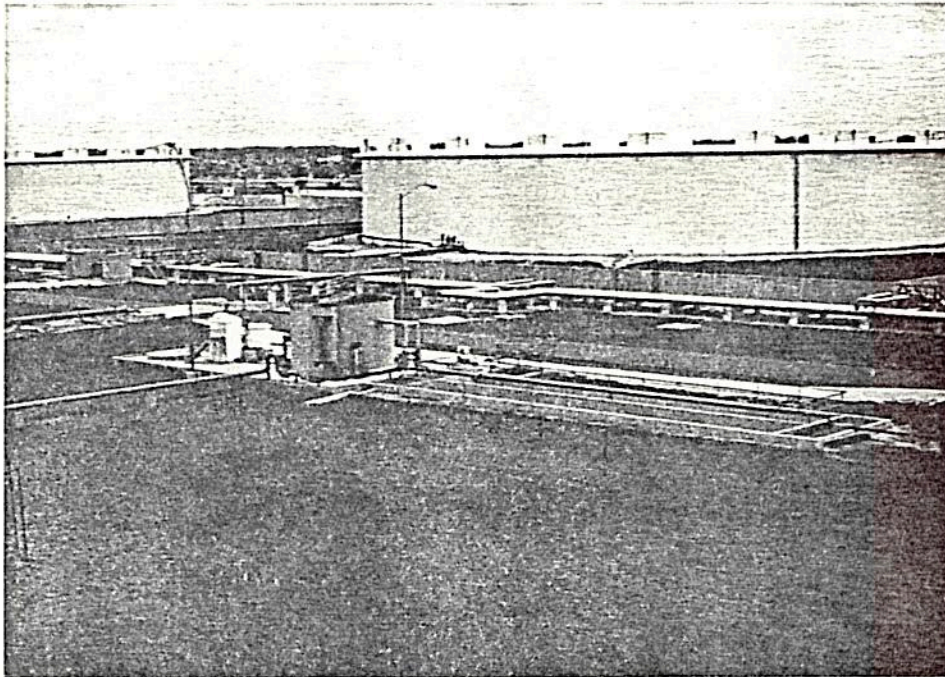
EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																	
W T X D 0 0 0 8 3 7 3 5 1 3 1													W DUP 2 DUP																	
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																														
W Z Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES																										
				1. PROCESS CODES (enter)																										
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																										
20-22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50		
1	D 0 0 2	204,000.000	T												S 0 4	T 0 1														
2	D 0 0 0	1.000	P												S 0 4															
3	D 0 0 2	9,440.000	T												S 0 4	T 0 1														
4	D 0 0 0	1.000	P												S 0 4															
5	D 0 0 0	10,410.000	T												S 0 4															
6	D 0 0 0	20,820.000	P												S 0 4															
7	D 0 0 0	1.000	P												S 0 4															
8	D 0 0 7	137,500	P												S 0 2	T 0 2														
9	D 0 0 0	57,050	P												T 0 1	S 0 2														
10	F 0 0 3	10,800	P												S 0 1															
11	F 0 0 5	included with above																												
12	U 0 1 3	1.000	P												S 0 1															
13																														
14																														
15																														
16																														
17																														
18																														
19																														
20																														
21																														
22																														
23																														
24																														
25																														
26																														

V. FACILITY DRAWING (see page 4)

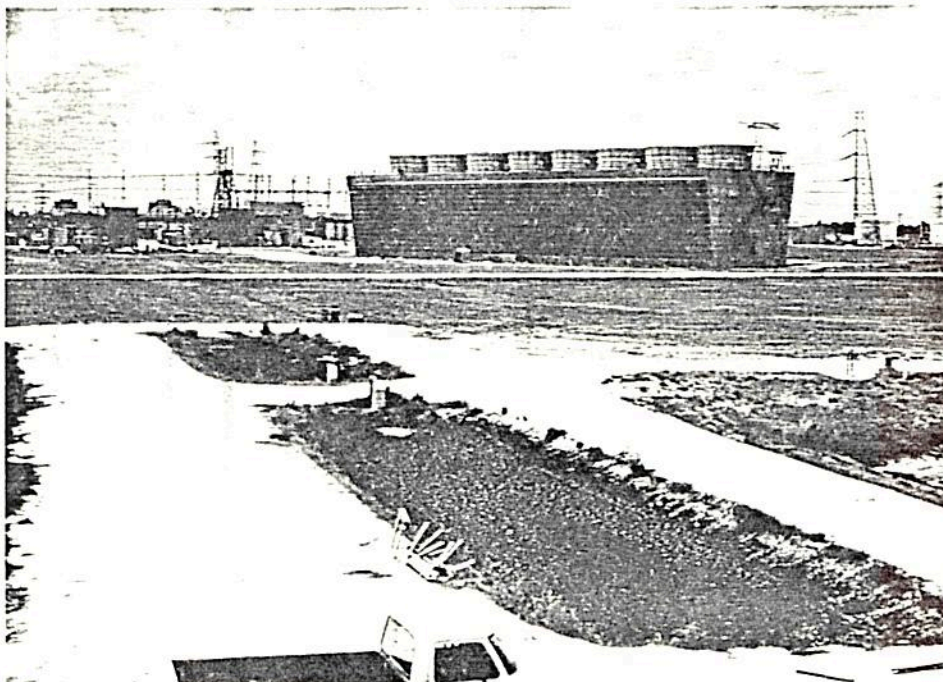


T.H. WHARTON GENERATING STATION (574.612 ACRES)

T. H. WHARTON GENERATING STATION

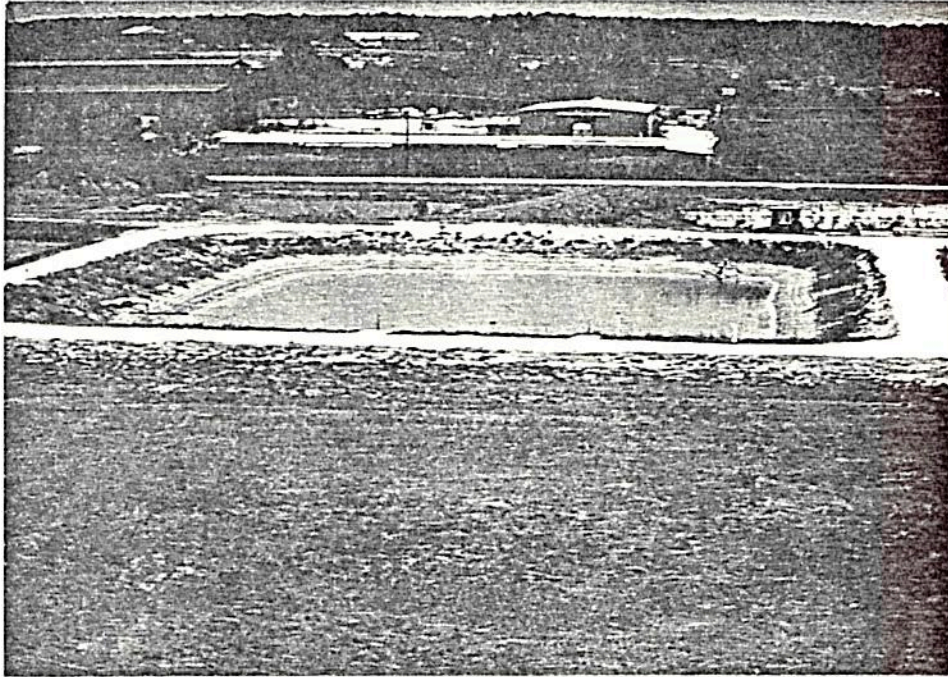


WASTE OIL & SLUDGE
COLLECTION FACILITY

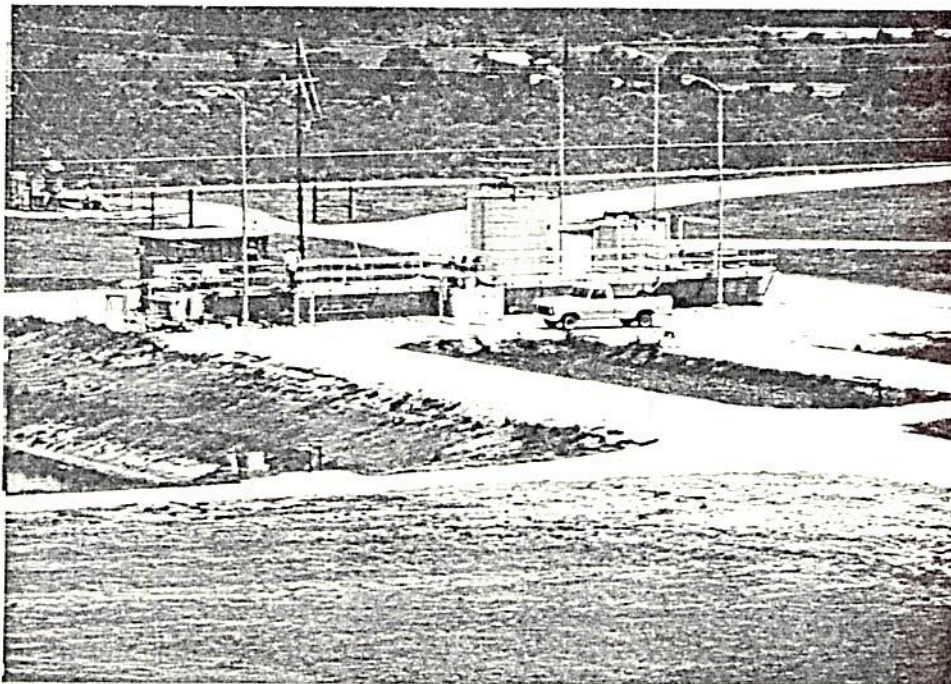


SAND DRYING BEDS

T. H. WHARTON GENERATING STATION



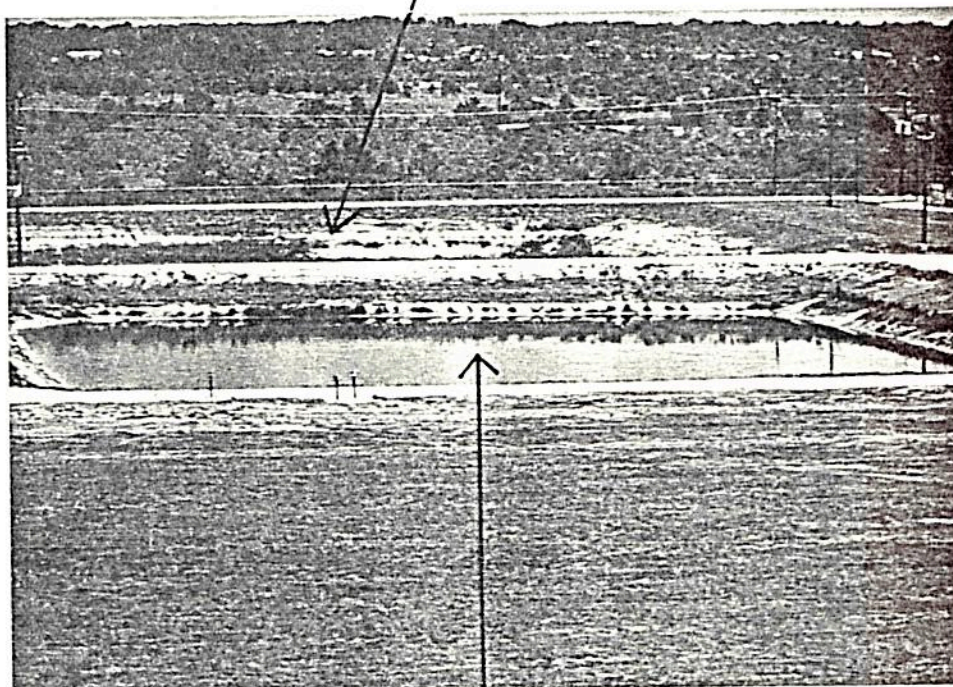
DEMINERALIZER REGENERANT
COLLECTION POND



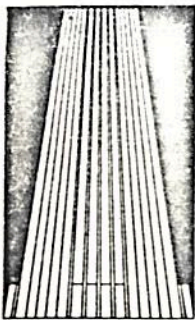
CHEMICAL WASTE
TREATMENT SYSTEM

T. H. WHARTON GENERATING STATION

METAL CLEANING
ORGANIC ACIDS
COLLECTION POND



METAL CLEANING
INORGANIC ACIDS
COLLECTION POND



Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

TXD000837351

November 19, 1980

EPA Region VI
Attn: 6 AEP
First International Bldg.
1201 Elm Street
Dallas, Texas 75270

SUBJECT: Submittal of Part A (Forms 1 and 3) of the Application for
EPA Hazardous Waste Permit.

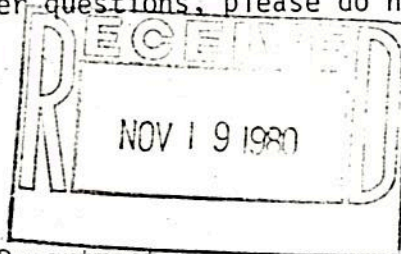
Pursuant to Section 3001 notification requirements under the Resource
Conservation and Recovery Act, Houston Lighting and Power Company is
enclosing the following sixteen (16) Part A applications:

- Allens Creek Nuclear Generating Station
- S. R. Bertron Generating Station
- Cedar Bayou Generating Station
- H. O. Clarke Generating Station
- Deepwater Generating Station
- Energy Development Complex
- Gable Street Generating Station
- Greens Bayou Generating Station
- Limestone Generating Station
- W. A. Parish Generating Station
- P. H. Robinson Generating Station
- South Houston Facility
- South Texas Nuclear Generating Station
- Underground Service Center
- Webster Generating Station
- T. H. Wharton Generating Station

Should you have any further questions, please do not hesitate to call
me at (713) 481-7145.

Sincerely,

W. F. McGuire, Manager
Environmental Protection Department



RECEIVED

NOV 19 1980

6AEP

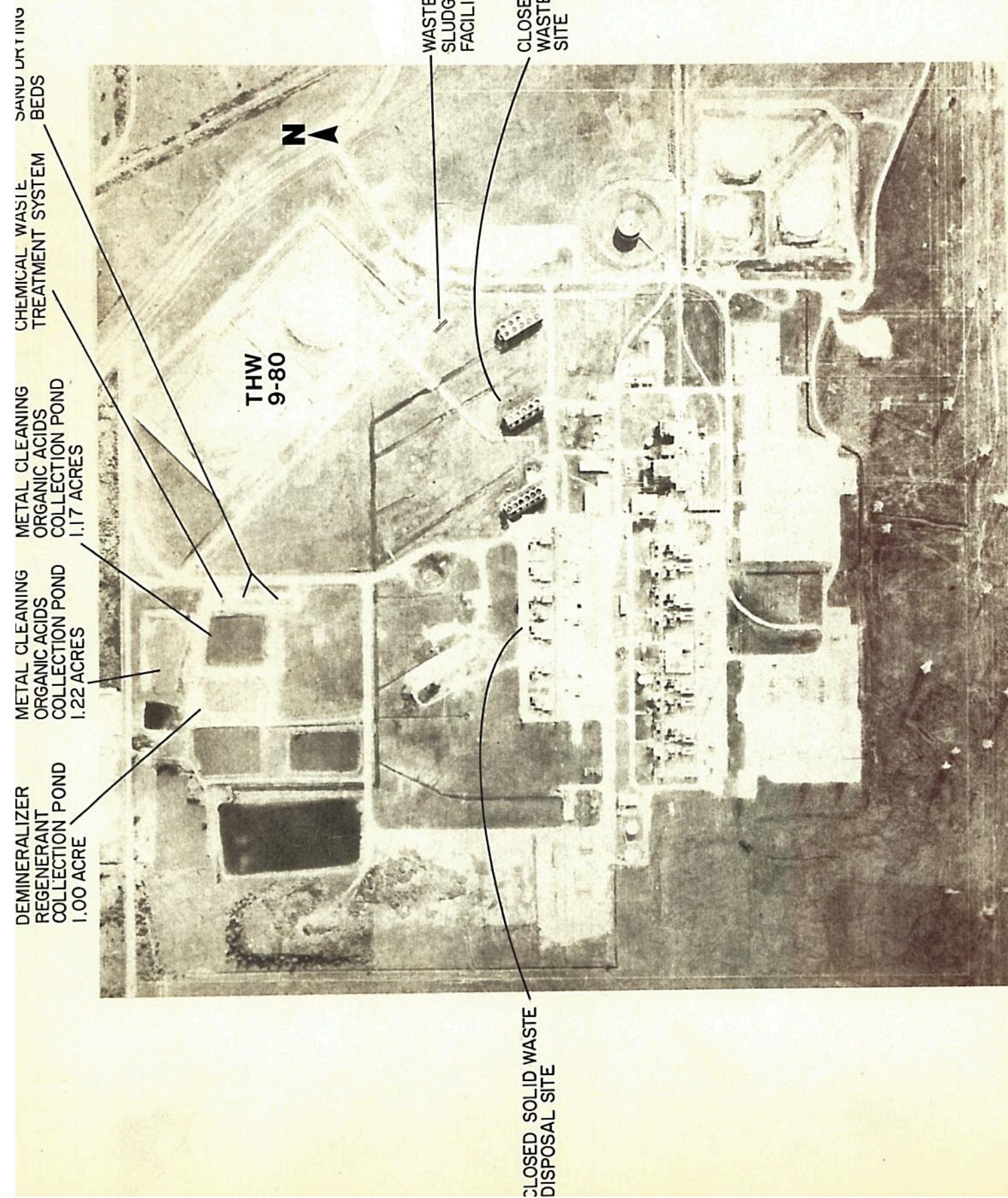
BCN/dhj

Enclosures

Rec'd : *Sandy Satterfield*
Date : 11-19-80



V. FACILITY DRAWING (see page 4)



T.H. WHARTON GENERATING STATION (574.612 ACRES)

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	T	X	D	0	0	0	8	3	7	3	5	1	3	6	
1	2												13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

2	9	5	6	2	8	0
65	66	67	68	69	70	71

0	9	5	3	1	5	4
72	73	74	75	76	77	78

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

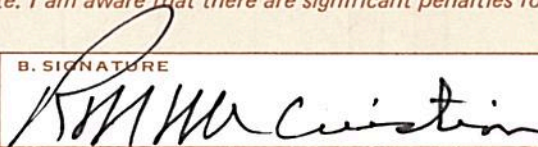
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. M. McCuiston
Vice President

B. SIGNATURE



C. DATE SIGNED

11-18-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																		
<div> <div>W T X D 0 0 0 8 3 7 3 5 1 3 1</div> <div>1 2 3 4 5 6 7 8 9 10 11 12</div> </div>													<div> <div>W DUP</div> <div>1 2 3 4 5 6 7 8 9 10 11 12</div> </div>																		
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																															
WASTE NO. (enter code)	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																											
				1. PROCESS CODES (enter)																											
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																											
20-22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50			
1	D 0 0 2	204,000.000	T												S 0 4	T 0 1															
2	D 0 0 0	1.000	P												S 0 4																
3	D 0 0 2	9,440.000	T												S 0 4	T 0 1															
4	D 0 0 0	1.000	P												S 0 4																
5	D 0 0 0	10,410.000	T												S 0 4																
6	D 0 0 0	20,820.000	P												S 0 4																
7	D 0 0 0	Unknown, small amount	P												S 0 4																
8	D 0 0 7	137,500	P												S 0 2	T 0 2															
9	D 0 0 0	57,050	P												T 0 1	S 0 2														listed to be compatible with State requirements	
10	F 0 0 3	10,800	P												S 0 1																
11	F 0 0 5	included with above																													
12	U 0 1 3	1.000	P												S 0 1																listed to be compatible with State requirements
13																															
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24																															
25																															
26																															

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			S F T X D 0 0 0 8 3 7 3 5 1 3 1 1 2 13 14 15											

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
A	8 0 1 1 1 9	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Storage:</u>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Disposal:</u>		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS.....	G	LITERS PER DAY.....	V	ACRE-FEET.....	A
LITERS.....	L	TONS PER HOUR.....	D	HECTARE-METER.....	F
CUBIC YARDS.....	Y	METRIC TONS PER HOUR.....	W	ACRES.....	B
CUBIC METERS.....	C	GALLONS PER HOUR.....	E	HECTARES.....	Q
GALLONS PER DAY.....	U	LITERS PER HOUR.....	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C				T/A C 1					
D U P									
1 2 13 14 15				16 17 18 19 20 21 22					
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)				1. AMOUNT	2. UNIT OF MEA- SURE (enter code)	
X-1	S 0 2	600	G		5	T 0 2	24,000.000	U	
X-2	T 0 3	20	E		6	S 0 2	3,000.000	G	
1	S 0 4	6,000,000.000 1,000,000.000	G		7	T 0 1	1,440,000	U	
2	S 0 4	1,000,000.000	G		8	S 0 1	1,801.000 1,800	G	
3	T 0 1	1,699,200.000 10,800.000	U		9	S 0 1	Unknown, small amount	G	
4	S 0 4	4,500,000.000	G		10				

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND														
C	7	4	9	1	1	(specify)					C	7	(specify)											
15	16	17	18	19	STEAM ELECTRIC POWER										15	16	17	18	19					
C. THIRD										D. FOURTH														
C	7	(specify)									C	7	(specify)											
15	16	17	18	19											15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																																																		B. Is the name listed in Item VIII-A also the owner?									
C	8	HOUSTON LIGHTING & POWER COMPANY																																																<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 66									
15	16																																																										
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)																													
F = FEDERAL										M = PUBLIC (other than federal or state)										P = PRIVATE										O = OTHER (specify)										C A 7 1 3 4 8 1 7 1 4 5																			
																				P										(specify)																													
E. STREET OR P.O. BOX																																																											
P O BOX 1700																																																											
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND																													
B HOUSTON																				TX					77001					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52																													

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																
C	9	N	T	X	0	0	0	6	4	0	8					C	9	P													
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																
C	9	U													C	9	S	0	1	0	3	9	(specify)								
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
															TEXAS DEPT. OF WATER RESOURCES																
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																
C	9	R													C	9	(specify)														
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. See Form 3 for hazardous waste facilities


XII. NATURE OF BUSINESS (provide a brief description)

STEAM ELECTRIC POWER PRODUCTION


F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)																				B. SIGNATURE																				C. DATE SIGNED									
R. M. McCUISTION																																								11-18-80									
VICE PRESIDENT																																																	
COMMENTS FOR OFFICIAL USE ONLY																																																	
C																																																	
15	16																																																

FORM 1
GENERAL



U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER
F T X D 0 0 0 8 3 7 3 5 1 3 D

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP T. H. WHARTON GENERATING STATION

IV. FACILITY CONTACT

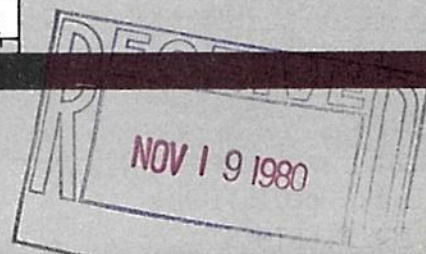
A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 M C G U I R E , W . F . M A N A G E R E N V I R O N	7 1 3 4 8 1 7 1 4 5		

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 P.O. BOX 1700		4 H O U S T O N	T X	7 7 0 0 1

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5 1 6 3 0 1 W . M O N T G O M E R Y		H A R R I S		H O U S T O N	T X	7 7 0 6 4	



OUT

IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)	CHARGED TO (PERSON & OFFICE)	DATE CHARGED OUT
	LOUETI	3/19/81
PART A	AO 10	5/29/81
PART B	JP	9/23/82
TXD 000887351	SCOTT	6/22/84
TXD 000 837351	SADOWSKI	6/26

OPTIONAL FORM 23
FEB 1962
GSA Circular No. 259

CHARGEOUT RECORD

GPO 64-16-90870-1 354-792

5023-101

DATE CHARGED OUT	CHARGED TO (PERSON & OFFICE)	IDENTIFICATION OF RECORD (NUMBER, TITLE AND/OR SUBJECT, DATE OF FILE OR DOCUMENT)

OUT

Part A, Permit Process Internal Checklist

ID Number TX0000837351 Inst Name HOUSTON LIGHTING & POWER T.H. WHARTON GENERATING STATION

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid Prmlg Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	<u>MS</u>	___	___
3	Form 1 received?	<u>MS</u>	___	___
1	Form 3 received?	<u>MS</u>	___	___
1 & 3	Postmarked on or before November 19, 1980?	<u>MS</u>	___	___
3	Date of operation entered?	<u>MS</u>	___	___
3	Date of operation on or before November 19, 1980?	<u>MS</u>	___	___
Notif. record	Notifier?	<u>MS</u>	___	___
"	Notified on or before August 18, 1980?	<u>MS</u>	___	___
1	Form 1, XIII B signed?	<u>MS</u>	___	___
3	Form 3, IX B Signed?	<u>MS</u>	___	___

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: _____)

PHASE TWO

1	Unsure if regulated or non-regulated?	___	<u>GT</u>
3	New facility?	___	<u>GT</u>
1 & 3	Core items missing? If Yes, indicate which items: Facility name___; location___; mail address___; operator info___; certification___; process info___; waste info___; owner___; sigs___.		

PHASE THREE

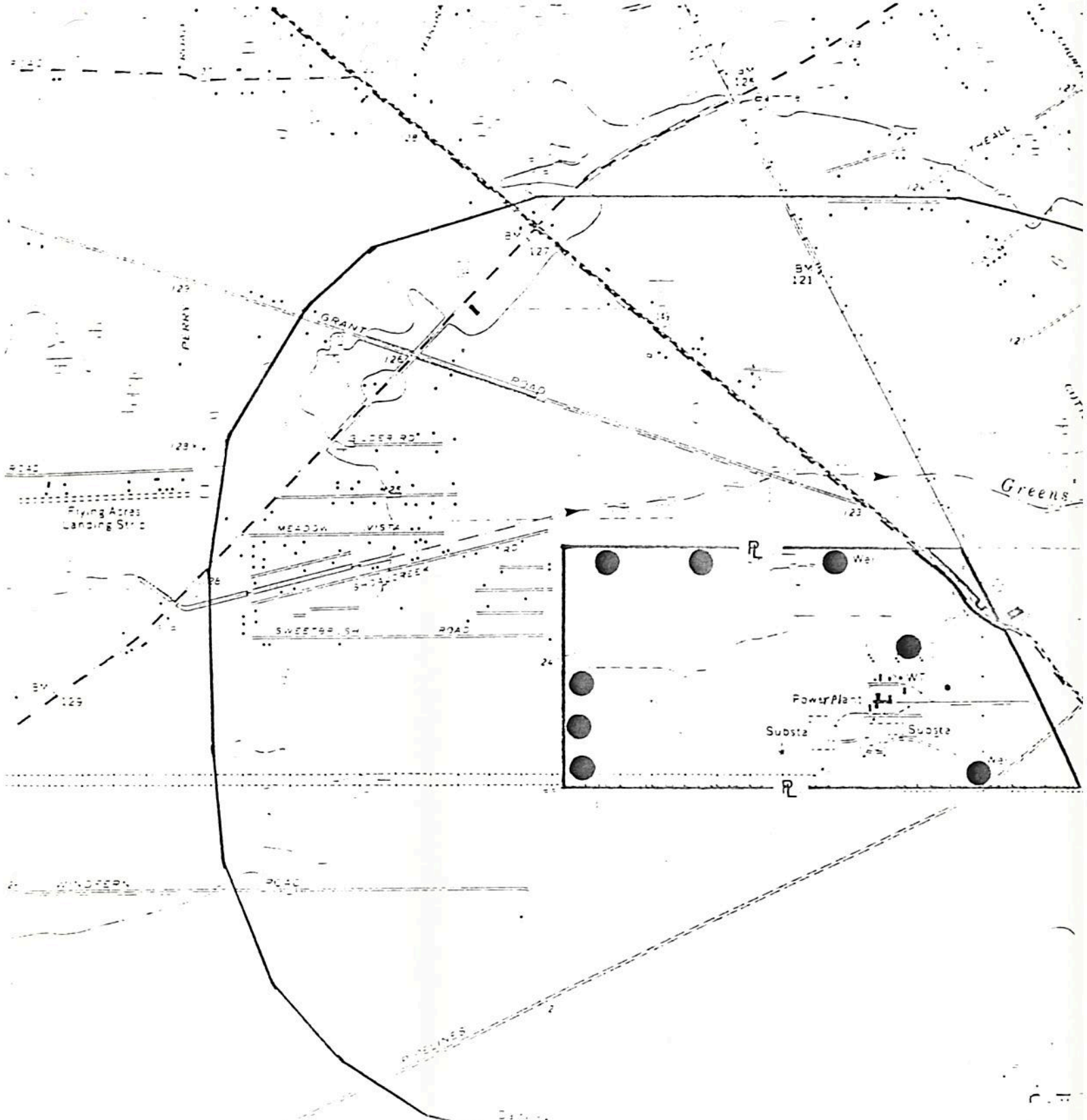
1 & 3	Non-core items missing? If Yes, indicate which items: Maps___; photos___; drawings___; lat/long___. Other observations and comments:
-------	--

Received Date Stamp

80-11-19

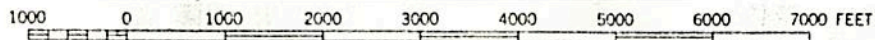
(Stamp forms also)

Log out/Log in
on reverse side.



Approximate mid-point of facility

Lat. N29°56'28" Long. W95°31'54"



Legend

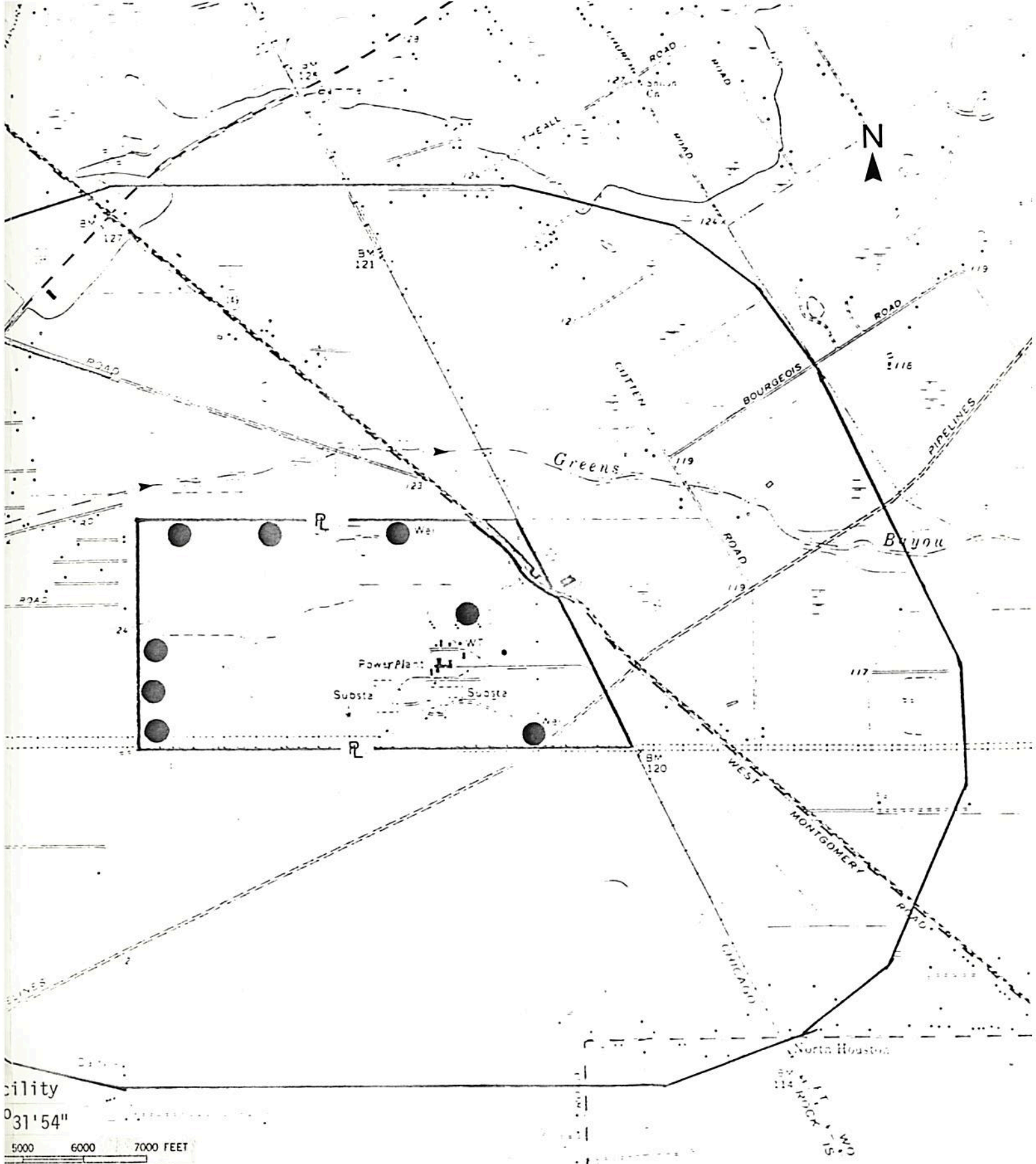


Industrial Well

Well Water Data

Texas Water Development Board

Ground-Water Data for Harris County, TX.



T. H. Wharton Generating Station
Houston Lighting & Power Co.

USGS- Satsuma, Texas 1916-70

ility
031'54"

5000 6000 7000 FEET

ity, TX.

CONTINUE ON REVERS

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	4	9	1	7			
(specify) STEAM ELECTRIC POWER				(specify)			
C. THIRD				D. FOURTH			
7				7			
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?	
HOUSTON LIGHTING & POWER COMPANY												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)	
F = FEDERAL S = STATE P = PRIVATE				M = PUBLIC (other than federal or state) O = OTHER (specify)				P		A		7 1 3 4 8 1 7 1 4 5	
E. STREET OR P.O. BOX													
P O BOX 1700													
F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND			
HOUSTON						TX		77001		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)											
9	N	T	X	0	0	0	6	4	0	8	9	P			
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)				(specify)							
9	U							0	1	0	3	9	TEXAS DEPT. OF WATER RESOURCES		
C. RCRA (Hazardous Wastes)				E. OTHER (specify)				(specify)							
9	R														

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. See Form 3 for hazardous waste facilities.

XII. NATURE OF BUSINESS (provide a brief description)

STEAM ELECTRIC POWER PRODUCTION

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
R. M. McCUISTION VICE PRESIDENT		<i>R. M. McCuiston</i>		11-18-80	
COMMENTS FOR OFFICIAL USE ONLY					

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY
		HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER											
F	T	X	D	0	0	0	8	3	7	3	5

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C										DUP										T/A C										1																																																																															
X-1										X-2										1										2										3										4																																																											
S										T										S										T										S										T																																																											
0										0										0										0										0										0																																																											
2										3										4										1										4										2																																																											
600										20										1,000,000										1,000,000										10,800										4,500,000										24,000										3,000										1,440,000										1,800										Unknown, small amount									
G										E										G										E										G										U										G										U										G																													

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS.....P
 TONS.....T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS.....K
 METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
W T X D 0 0 0 8 3 7 3 5 1													W DUP														
1 2 3 4 5 6 7 8 9 10 11 12													13 14 15 16 17 18 19 20 21 22 23 24 25 26														
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																											
W T X D Z	A. EPA HAZARD. WASTENO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES																
											1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
1	D	0	0	2	408,000,000				P		S	0	4	T	0	1											
2	D	0	0	0	Unknown, small amount						S	0	4														
3	D	0	0	2	18,880,000				P		S	0	4	T	0	1											
4	D	0	0	0	Unknown, small amount						S	0	4														
5	D	0	0	0	20,820,000				P		S	0	4														
6	D	0	0	0	Unknown, small amount						S	0	4														
7	D	0	0	7	137,500				P		S	0	2	T	0	2											
8	D	0	0	0	57,050				P		T	0	1	S	0	2											listed to be compatible with State requirements
9	F	0	0	3	10,800				P		S	0	1														
10	F	0	0	5	included with above																						
11	U	0	1	3	Unknown, small amount						S	0	1														listed to be compatible with State requirements
12																											
13																											
14																											
15																											
16																											
17																											
18																											
19																											
20																											
21																											
22																											
23																											
24																											
25																											
26																											

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

FTXD000837351	T/A C	6
---------------	-------	---

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

29	56	28
----	----	----

95	31	54
----	----	----

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. M. McCuiston
Vice President

B. SIGNATURE



C. DATE SIGNED

11-18-80

X. OPERATOR CERTIFICATION

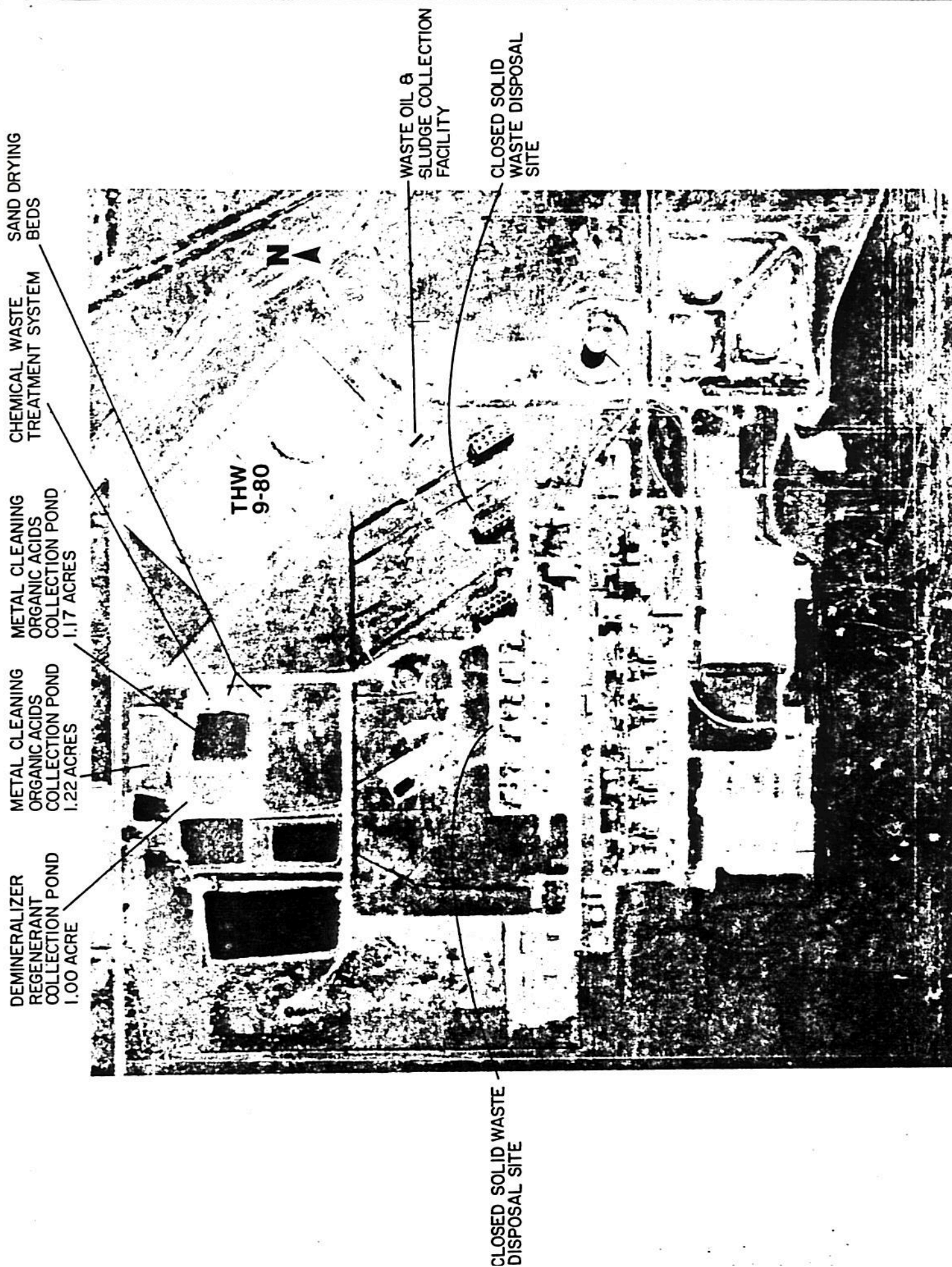
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 1)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

July 20, 1981

Houston Light & Pwr-T.H. Wharton Generating Station
Attn: W.F. McGuire
P.O. Box 1700
Houston, Texas 77001

EPA ID NUMBER: TXD 00 083 7351

FACILITY LOCATION: 16301 West Montgomery Road
Houston, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely,

Diana Dutton, Director
Enforcement Division (6E)

cc: Texas Department of Water Resources

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date prepared: July 21, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location and EPA identification number:

Name: Houston Light & Power-T.H. Wharton Generating Station

Location: 16301 West Montgomery Road

Houston, Texas

EPA ID No: TXD 00 083 7351

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265:

Owner's name: Houston Lighting & Power Company

Operator's name: Houston Lighting & Power Company

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated:

<u>Process Code</u>	<u>Design Capacity Amount</u>	<u>Unit of Measure</u>
<u>S04</u>	<u>6,000,000.</u>	<u>Gallons</u>
<u>T01</u>	<u>1,699,200.</u>	<u>Gallons per day</u>
<u>T02</u>	<u>24,000.</u>	<u>Gallons per day</u>
<u>S02</u>	<u>3,000.</u>	<u>Gallons</u>
<u>S01</u>	<u>1,801.</u>	<u>Gallons</u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid wastes exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers:

<u>D002</u>	<u>D000</u>	<u>D007</u>	<u>F003</u>	<u>F005</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

July 20, 1981

C# 10501

Houston Light & Pwr-T.H. Wharton Generating Station
Attn: W.F. McGuire
P.O. Box 1700
Houston, Texas 77001

EPA ID NUMBER: TXD 00 083 7351

FACILITY LOCATION: 16301 West Montgomery Road
Houston, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely,

Diana Dutton, Director
Enforcement Division (6E)

cc: Texas Department of Water Resources

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date prepared: July 21, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location and EPA identification number:

Name: Houston Light & Power-T.H. Wharton Generating Station

Location: 16301 West Montgomery Road

Houston, Texas

EPA ID No: TXD 00 083 7351

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265:

Owner's name: Houston Lighting & Power Company

Operator's name: Houston Lighting & Power Company

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated:

<u>Process Code</u>	<u>Design Capacity Amount</u>	<u>Unit of Measure</u>
<u>S04</u>	<u>6,000,000.</u>	<u>Gallons</u>
<u>T01</u>	<u>1,699,200.</u>	<u>Gallons per day</u>
<u>T02</u>	<u>24,000.</u>	<u>Gallons per day</u>
<u>S02</u>	<u>3,000.</u>	<u>Gallons</u>
<u>S01</u>	<u>1,801.</u>	<u>Gallons</u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid wastes exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers:

<u>D002</u>	<u>D000</u>	<u>D007</u>	<u>F003</u>	<u>F005</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO : S. W. Registration # 31636
File (Existing/~~New~~)
PAP Application # 10501

DATE: 3/16/82

FROM : RCRA Forms Consolidation Team _____

SUBJECT: Company: H L & P
Site : Wharton Sta

Attached herewith please find the following document(s):

____ EPA 8700-12

✓ EPA 3510

✓ TDWR Part A

____ Other: _____

RECEIVED

MAR 16 1982

CR/TDWR

These documents are being placed in this file until processing at a later date.

Confidential material associated with these documents (~~IS~~/IS NOT) being held in the solid waste section for review.

HAZARDOUS WASTE ADMINISTRATIVE CHECK LIST

- | | | |
|---|---------|--------|
| 1. Active Corporation | Yes () | No () |
| 2. Postage Fee Present | Yes (✓) | No () |
| 3. Signature Page (Original) Signed by Appropriate Person | Yes (✓) | No () |
| 4. Signature Page Notarized | Yes (✓) | No () |
| 5. Acceptable List of Landowners and Their Addresses | Yes (✓) | No () |
| 6. Acceptable Map of Landowner Locations | Yes (✓) | No () |
| 7. Mandatory Attachments Identified on Page 16 | Yes () | No () |
| a. USGS Map | Yes (✓) | No () |
| b. Site Legal Description | Yes (✓) | No () |
| c. Hazardous Waste Facility Component Summary Sheet | Yes (✓) | No () |
| d. Facility Boundaries and Adjacent Waters Map | Yes (✓) | No () |
| e. Photographs | Yes (✓) | No () |
| f. Process Flow Diagram/Description | Yes (✓) | No () |
| g. Copy of Lease if Site is not Owned by Applicant | Yes () | No () |

1. Houston Lighting and Power
 2. Harris
 3. T.H. Wharton Station

CH 10501

31634

ATTACHMENT A

"Part A Application Revisions"

T. H. Wharton Generating Station

Revised Part A Application

Appropriate tables/pages (attached) of the Part A application have been revised to reflect current hazardous waste management practices at T. H. Wharton Generating Station.

The Part A application prepared in August 1980 listed several wastes/facility components which have been removed in the revised Part A. These wastes/components are discussed below:

1. Demineralizer Regenerant Inorganic Sludge

This sludge accumulates at the bottom of the demineralizer impoundment from storage of demineralizer regenerant. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241470).

2. Metal Cleaning and Other Inorganic Sludge

This sludge accumulates at the bottom of the inorganic impoundment from storage of hydrochloric acid boiler and equipment cleanings, and boiler blowdown. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241210).

3. Metal Cleaning Organic Acids/Metal Cleaning Organic Acids Collection Pond

This waste is generated from ammoniated citric acid or hydroxyacetic-formic acid boiler and equipment cleanings. It is stored in an impoundment prior to being injected in an energy-producing boiler for incineration. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 215290). The organic impoundment has, therefore, never received hazardous waste.

4. Metal Cleaning Organic Sludge

This sludge accumulates at the bottom of the organic impoundment. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 248990).

5. Chemical Waste Treatment Sludge/Chemical Waste Treatment System & Sand Drying Beds

A concrete chemical waste treatment system is used to treat demineralizer regenerant, inorganic metal cleaning waste (when produced), and boiler blowdown prior to NPDES discharge. The sludge which accumulates in the settling chamber of the treatment system is

pumped to sand drying beds for dewatering and periodic off-site disposal. Based on EP toxicity analyses submitted to your office on February 23, 1981 (letter attached), this sludge has been declassified to a Class II waste (TWC 240540).

6. Waste Oil and Sludge/Waste Oil and Sludge Collection Facility

Oily sludge generated from the oily waste treatment system is classified as a Class I nonhazardous or Class II waste, depending on the amount of oil present in the sludge. The attached EP toxicity analyses of oily sludge indicate that no hazardous constituents are present.

7. Asbestos in Insulation

Insulation containing asbestos is classified as a Class I nonhazardous waste (TWC 170750). Asbestos, originally listed on the Part A application, has been delisted from the hazardous waste list (CFR 40.261).

T. H. Wharton Generating Station

Table III-1 Generated Hazardous Wastes and Management Activities

[illegible]

¹ "Storage" means the interim containment or control of waste after generation and prior to ultimate disposal.

² "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste so as to render such waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, ship, pipeline, or other means.

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Demineralizer Acid and Base Regeneration Wastewater</u>
Process (see last column in Table III-1)	<u>Water Treatment</u>
TDWR Sequence Number of Waste (if assigned)	<u>007, 008</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> 1 Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Inorganic Metal Cleaning Waste</u>
Process (see last column in Table III-1)	<u>Boiler & Condenser Cleaning</u>
TDWR Sequence Number of Waste (if assigned)	<u>010</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<u>1</u> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Spent Solvents</u>
Process (see last column in Table III-1)	<u>Degreasing</u>
TDWR Sequence Number of Waste (if assigned)	<u>005</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input checked="" type="checkbox"/> 1 Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input checked="" type="checkbox"/> 1 Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>Mixed with</u>
<input type="checkbox"/> Landfill (other)	<u>waste oil for pickup by a</u>
	<u>waste oil recycling firm</u>

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Paint Thinner</u>
Process (see last column in Table III-1)	<u>Painting</u>
TDWR Sequence Number of Waste (if assigned)	<u>006</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input checked="" type="checkbox"/> 1 Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

Table III-4 Hazardous Waste Facility Components List

Facility Component	TDWR Seq. No.	Status		Design Capacity		Number of Years Utilized	Date in Service 1974 1979
		Inactive	Active	(cu yds)	(gal)		
Lagoon/Pond (lined)	01		X		1,000,000	10	(relined)
Verbal Description: Clay lined pond for the collection of demineralizer regeneration wastes prior to treatment.							
Treated wastewater is discharged via NPDES permit.							
Lagoon/Pond (lined)	02		X		1,000,000	10	1979
Verbal Description: Clay lined pond for the collection of metal cleaning inorganic acid wastes from boiler and equipment cleaning operations prior to treatment. Treated wastewater is discharged via NPDES permit.							
Boiler (Energy-producing)	03		X		NA	NA	NA
Verbal Description: Spent solvents are mixed with waste oil prior to incineration in the boiler.							
Drum Storage Area	05		X		NA	4	1980
Verbal Description: Drum storage area for the collection of waste paint thinner and spent solvents prior to off-site disposal.							
Verbal Description:							
Verbal Description:							

Attachment G

T. H. Wharton Generating Station

Process Description for Hazardous Waste Streams

1. Demineralizer Acid and Base Regeneration Wastewater (EPA Hazard Code C)

Demineralizer regenerant waste is collected in the demineralizer impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment and suspended solids removal. Treated wastewater is discharged in accordance with the NPDES permit.

2. Inorganic Metal Cleaning Waste (EPA Hazard Code C)

Inorganic metal cleaning waste is collected in the inorganic impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment, suspended solids and metals removal. Treated wastewater is discharged in accordance with the NPDES permit.

3. Spent Solvents (EPA Hazard Code I)

Spent solvents are collected in drums, mixed with waste oil for recycling, or incinerated in an energy-producing boiler. *

4. Paint Thinner (EPA Hazard Code I, T)

Paint thinner waste is collected in drums. These drums are temporarily stored prior to off-site disposal. *



Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

April 8, 1981

Mr. Jay Snow
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of the various waste streams and sludges generated at Houston Lighting & Power Company's generating stations. These waste streams and sludges were reported as being hazardous on our Part A, TDWR Hazardous Waste Registrations solely on the basis of Extraction Procedure (EP) Toxicity with the exception of metal cleaning inorganic acid waste, which was also listed on the basis of corrosivity, and demineralizer regenerant, which was listed only on the basis of corrosivity (See Attachment I).

The attached tables summarize the EP toxicity test results performed on each sample, including samples of demineralizer regenerant. The analyses were performed by our contract laboratory, Southern Petroleum Laboratories, and were done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. An attachment (Attachment II) has also been provided which identifies various abbreviations used in the summary tables to aid in your review.

The EP toxicity analytical data does not indicate the presence of toxic components in concentrations greater than the EP toxicity test limits. Therefore, as a result of our testing, we feel that those wastes previously considered hazardous due to EP toxicity should be declassified from the hazardous waste category.

It was stated above that two waste streams, demineralizer regenerant and metal cleaning inorganic acid wastes were listed as hazardous on the basis of corrosivity. The individual components that comprise each of these two waste streams when analyzed separately could result in pH values outside the specified range of the classification system. For example, if grab samples were taken of the cation and anion demineralizer regeneration wastes, the cation wastes could exhibit low pH values, and the anion wastes could exhibit high pH values.

Houston Lighting & Power Company

Mr. Jay Snow

April 8, 1981

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

However, a composite sample of all the demineralizer regeneration wastes, due to neutralization of the wastes, would be classified as simply solid wastes since the pH would fall between 2 and 12.5. The same type of example can be applied to metal cleaning inorganic acid waste as well, whereby the composite pH of the waste product would not qualify it as hazardous.

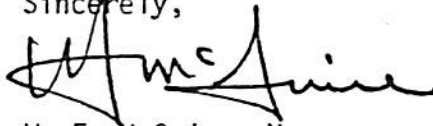
With respect to the corrosion of metals test to determine if a waste exhibits characteristics of corrosivity, many of the samples collected for EP toxicity analysis, including demineralizer regenerant and metal cleaning inorganic acid waste, were subjected to this test. The corrosivity analyses were performed in accordance with the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods." All samples indicated corrosion rates of less than 1 millimeter per year. This is substantially less than the 6.35 millimeter per year standard specified in the regulations.

It is also important to note that demineralizer regenerant and metal cleaning inorganic acid wastes are chemically treated and discharged under NPDES and TDWR wastewater discharge permits.

Considering the characteristics of demineralizer regenerant and metal cleaning inorganic acid waste described above and the corrosivity data, we do not feel that these two types of waste should be classified as hazardous waste prior to their treatment.

We therefore request declassification of all wastes specified in Attachment I. If you concur with our evaluation please notify us so that we can revise our Hazardous Waste Management program accordingly.

Sincerely,



W. F. McGuire, Manager
Environmental Protection Department

RTB/dhj

- Attachments -
- I. Waste Listing
 - II. Data Table Key
 - III. EP Toxicity Data Tables (six)
 - IV. Analytical Reports

ATTACHMENT I

HOUSTON LIGHTING & POWER COMPANY

WASTE LISTINGS

<u>WASTE DESCRIPTION</u>	<u>BASIS for LISTING AS HAZARDOUS</u>
Demineralizer Regenerant	C
Demineralizer Regenerant Inorganic Sludge	E
Metal Cleaning Inorganic Acids	EC
Metal Cleaning Inorganic Sludge	E
Metal Cleaning Organic Acids	E
Metal Cleaning Organic Sludge	E

C - Corrosive

E - E.P. Toxicity

ATTACHMENT II

HOUSTON LIGHTING & POWER COMPANY

DATA TABLE KEY

<u>PLANT NAME</u>	<u>PLANT ABBREVIATION</u>	<u>TDWR SOLID WASTE REGISTRATION NO.</u>
S. R. BERTRON	SRB	31637
CEDAR BAYOU	CBY	31639
H. O. CLARKE	HOC	31635
DEEPWATER	DWP	31632
GREENS BAYOU	GBY	31634
W. A. PARISH	WAP	31631
P. H. ROBINSON	PHR	31638
WEBSTER	WEB	31633
T. H. WHARTON	THW	31636

For some of the waste sampled there exists more than one set of data. This is due to one of two reasons; 1) sample collections representing different dates; 2) sample collections representing more than one storage/treatment facility for that particular type of waste. These samples are denoted by their direction relative to one another (N,S,E,W) or by number notation.



CLOSURE PLAN FOR TWO HAZARDOUS WASTE SURFACE IMPOUNDMENTS
AT THE T. H. WHARTON GENERATING STATION

For
Houston Lighting & Power Company
Houston, Texas

By
Underground Resource Management, Inc.
Austin, Texas

April, 1984



TABLE OF CONTENTS

	<u>Page</u>
PURPOSE OF CLOSURE PLAN.	1
IMPOUNDMENT DESCRIPTION.	3
WASTE EVALUATION	6
CLOSURE PROCEDURE AND SCHEDULE	9
FINAL CLOSURE OF THE IMPOUNDMENT SITES	12

LIST OF TABLES

Table 1 - T. H. Wharton Impoundment Sediment	7
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LIST OF FIGURES

Figure 1 - T. H. Wharton Generating Station, Site Plan	4
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PURPOSE OF CLOSURE PLAN

The T. H. Wharton Generating Station is currently classified as a hazardous waste generator/storer/treater/disposer under the Industrial Solid Waste Rules of the Texas Department of Water Resources (TDWR). The power plant generates two major waste streams which are classified as hazardous by State and Federal regulations: portions of the demineralizer waste regeneration and the hydrochloric acid phase of a boiler or condenser chemical cleaning when hydrochloric acid is used. Both waste streams are classified as corrosive and therefore hazardous because the pH of segments of these wastes may be less than 2 when the wastes are routed to the receiving surface impoundments. The waste streams in the surface impoundments are routed to a chemical waste treatment system for pH adjustment. The wastewaters are then discharged via the facility's permitted NPDES outfall.

Houston Lighting & Power (HL&P) plans to eliminate storage of hazardous wastes in the impoundments by constructing a concrete tank facility to receive all wastewater that could have a pH less than 2 or greater than 12.5. These wastewater streams will include the spent demineralizer regenerant, the hazardous portion of hydrochloric acid cleaning waste, and drains from the chemical waste treatment area and the plant laboratory sink.

Utilization of a concrete tank will meet the exemption requirements of EPA Interim Status Standards 40 CFR 265.1 Subpart A Purpose, Scope, and Applicability. ^{not}

[C] "The requirements of this part do not apply to:

[10] The owner or operator of an elementary neutralization



unit or a wastewater treatment unit as defined in §260.10 of this chapter."

Section 260.10 requires the unit to be constructed of non-earthen materials like concrete, to be self-supporting, and to be part of an NPDES-regulated discharge. The proposed unit will meet all regulatory criteria for exemption from RCRA requirements. Waste in the concrete tank will be treated in the chemical waste treatment system to bring the pH above 2. The treated wastewater will not be classified as hazardous and will meet the discharge criteria of the NPDES permit.

This closure plan is developed to meet the requirements of the 31 Texas Administrative Code (TAC) Section 335. Industrial Solid Waste (TDWR Chapter XXII); Subchapter N. Surface Impoundments as follows:

"§ 335.286 Closure and Postclosure:

- a. At closure, the owner or operator may elect to remove from the impoundment:
 1. Standing liquids;
 2. Waste and waste residues;
 3. The liner, if any; and
 4. Underlying and surrounding contaminated soil;
- b. If the owner or operator removes all the impoundment materials listed in Subsection (a), or can demonstrate that none of the materials listed in Subsection (a) remaining at any stage of removal are hazardous wastes, the impoundment is not further subject to the requirements of this Subchapter."



IMPOUNDMENT DESCRIPTION

The Wharton Generating Station currently uses two storage impoundments for low pH wastewater as shown on Figure 1. The demineralizer, or west impoundment, has approximate dimensions of 265 feet by 164 feet by 14.5 feet deep, with side slopes of 3 to 1. The dimensions of the inorganic metal cleaning impoundment are approximately 255 feet by 220 feet by 14.5 feet deep with side slopes of 3 to 1.

Both the demineralizer and the inorganic impoundments were constructed from 1973 to 1974. The demineralizer impoundment originally received demineralizer regenerant wastewater and boiler blowdown water. The inorganic impoundment originally received metal cleaning wastes from both organic and inorganic processes.

In 1979, a chemical waste treatment system was installed and a separate impoundment constructed for organic cleaning wastes. Boiler blowdown was rerouted from the demineralizer impoundment into the inorganic impoundment and the inorganic and demineralizer impoundments were relined with compacted natural clay.

The demineralizer impoundment currently receives demineralizer regenerant waste, rainwater runoff from the bermed area around the impoundment, and runoff from drains below the three demineralizer areas. The pH of these combined wastewaters averages about 2.2. A 300 gpm pump cycles water from this impoundment into the chemical waste treatment unit. If the treated wastewater pH meets NPDES standards, it is discharged; otherwise it is recycled to the impoundment. The inorganic impoundment receives boiler blowdown, inorganic boiler and condenser cleaning waste when produced, and drainage through a gravity pipe below the chemical waste treatment area. The last inorganic boiler cleaning

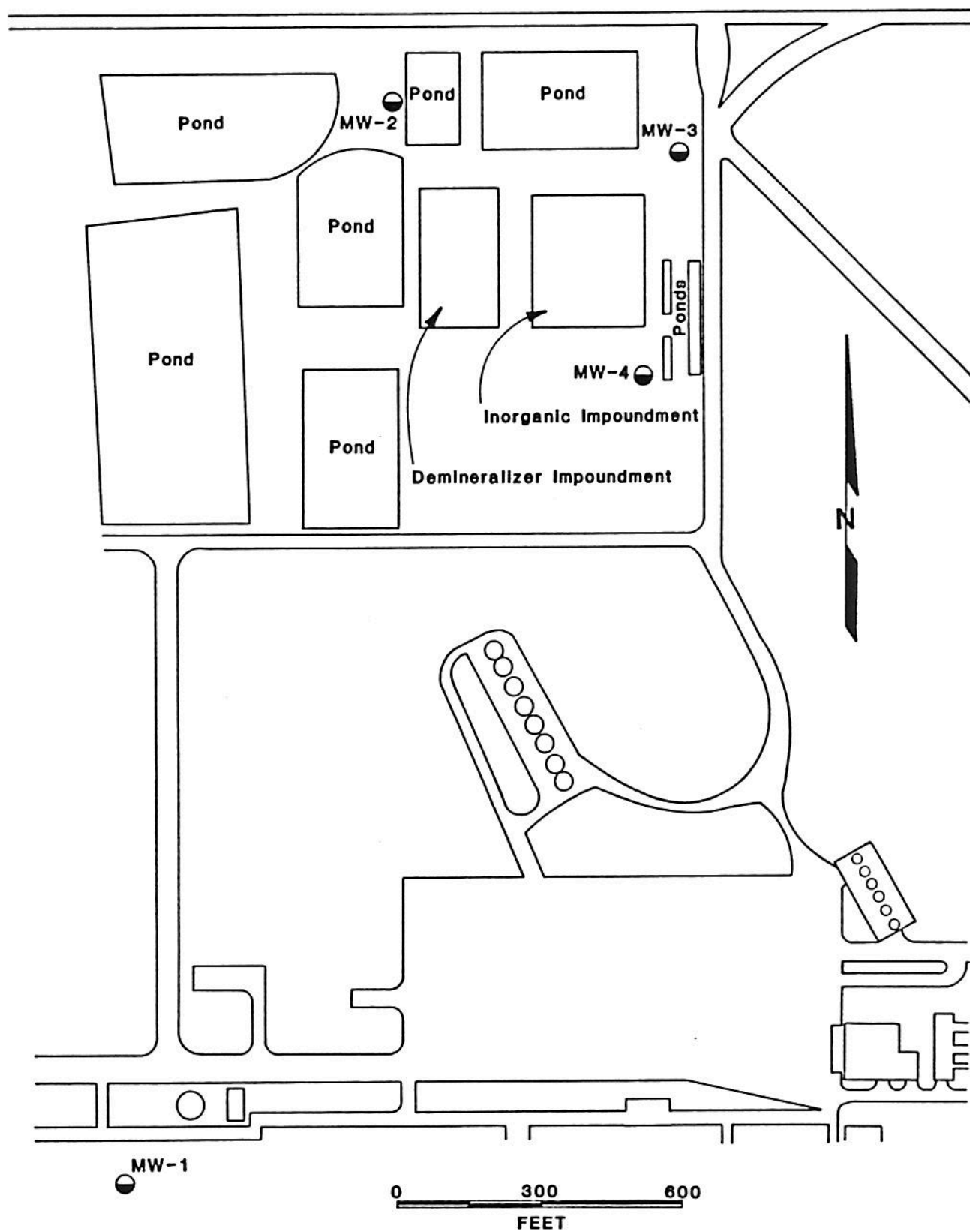


Figure 1. T.H. Wharton Generating Station, Site Plan.



was in September, 1980 and the last inorganic condenser cleaning in March, 1982. The typical pH for this impoundment is neutral to slightly alkaline, i.e. pH 7 to 8.

Since the water in the inorganic impoundment is usually near neutral, it is unlikely that the clay liner will exhibit a pH less than 2. The typical pH in the demineralizer impoundment is 2.2; therefore, the clay liner may require treatment with caustic to raise the pH.



WASTE EVALUATION

Wastes which must be managed during the closure of the T.H. Wharton Generating Station demineralizer and inorganic impoundments are any wastewater inventory in the impoundments and any contaminated soil below the impoundments. Of these wastes, the one with hazardous characteristics is wastewater in the demineralizer impoundment with a corrosive pH less than 2. Tests will be conducted in the field to verify that the pH of water in the soils is non-corrosive. Results of these tests will be submitted to the TDWR.

Soil pore water below the inorganic impoundment is unlikely to exhibit a low pH. The last inorganic cleaning at this station was of condenser No. 4 in March, 1982. Boiler blowdown and rainwater currently in the impoundment exhibits a pH of 7 to 8, and the pH of retained water in the soil lining would likely be in equilibrium with water in the impoundment.

The clay liner of the demineralizer impoundment may exhibit a lower pH than that of the inorganic impoundment. Wastewater in the impoundment typically exhibits a pH of about 2.2. Preliminary measurements of a sample from this impoundment showed a pH of 3.78, and a dry soil sample from the bank of the demineralizer impoundment mixed with an equal mass of deionized water (according to ASA Part 60-3 standard method) had a pH of 3.56.

Since no wastes defined as EP toxic have been discharged to these impoundments, it is unlikely that the soils would exhibit the EP toxicity characteristics. This conclusion is supported by the sediment sample test data for all EP toxicity metallic constituents presented in Table 1. Similar data from other HL&P generating stations show little



TABLE 1
T. H. WHARTON IMPOUNDMENT SEDIMENT¹

<u>Constituent</u>	<u>EP Toxic Concentration² (mg/L)</u>	<u>Demineralizer Regenerant (mg/L)</u>	<u>Inorganic Metal Cleaning (mg/L)</u>
Arsenic	5.0	<0.05	<0.05
Barium	100.0	11.9	10.7
Cadmium	1.0	<0.05	<0.05
Chromium	5.0	<0.05	<0.05
Lead	5.0	<0.1	<0.1
Mercury	0.2	<0.005	<0.005
Selenium	1.0	<0.05	<0.05
Silver	5.0	<0.05	<0.05
Endrin	0.02	<0.02	<0.02
Lindane	0.4	<0.4	<0.1
Methoxychlor	10.0	<1	<1
Toxaphene	0.5	<0.5	<0.5
Dichlorophenoxyacetic acid	10.0	<1	<1
Trichlorophenoxypropionic acid	1.0	<1	<1

¹Data developed by HL&P as per RCRA waste analysis requirements. Material currently listed on TDWR registration as Class II.

²Maximum concentrations from 40 CFR 261; 48 FR 15256 - maximum concentration of contaminants for characteristic of EP toxicity.



variability, and all values are well below the concentration limits established for the EP toxicity test.

These assumptions regarding the impoundment lining characteristics will be tested. A field survey to map the pH of the clay liner soil water of each impoundment will be conducted by an independent consultant, Underground Resource Management, Inc., and the results will be submitted to TDWR as an addendum to the closure plan. The survey will consist of field measurements of the pH of surface soil water at 10 locations distributed across each of the impoundment bottoms. Where surface soil water pH is less than 2, core samples will be collected to map the depth of low pH soil water. Soils which are too dry to measure pore water pH directly will be prepared with deionized water according to the ASA Part 60-3 standard method.

Two laboratory samples from each impoundment will be collected during the field pH survey. These samples, one of the soil liner and one of the wastewater, will be tested according to standard Extraction Procedures (EP) defining toxicity. The results of these tests will also be submitted to the TDWR.



CLOSURE PROCEDURE AND SCHEDULE

Closure of the inorganic surface impoundment at the T. H. Wharton Generating Station will begin on September 7, 1984 (subject to approval by TDWR) and will consist of these steps:

1. Termination of Discharge into the Impoundment

Day from start: 1

Time to complete: 1 day

All discharge into the impoundment will cease. Pipes will be rerouted or removed, or blind flanges will be installed. Boiler blowdown will be rerouted into the demineralizer impoundment.

2. Discharge of Wastewater

Day from start: 2

Time to complete: 7 days

Wastewater will be discharged from the impoundment to the wastewater treatment system as during normal operation. When the impoundment is gravity drained to 6 inches, a portable 4 horsepower gasoline pump will be used to pump the remaining water to the treatment system. Normally the impoundment is emptied in about two days. Seven days are allowed to operate during rainy weather and to allow discharge of water from bank storage.

3. Neutralizing the Soils (If Necessary)

Day from start: 9

Time to complete: 3 days

The location and total volume of soil requiring treatment will be determined by field sampling. If any soils require



treatment, the volume of lime required to neutralize the soil water will be calculated, and an outside contractor (not selected at this time) will apply lime and disk it into the soil to the lowest depth where soil water pH is less than 2. Preliminary laboratory tests on the clay liner suggest that an application rate of one pound of lime for 10 pounds of soil will raise the pH of the soil water to above 6. This application rate will be field tested. Necessary equipment provided by the contractor will be a vehicle capable of spreading the lime, disking the soil, and navigating the slopes into the bottom of the impoundment.

4. Final Soil Samples (If Necessary)

Day from start: 12

Time to complete: 1 day

If lime treatment of the soil as described in Step 3 is required, the original sampling sites where low pH soil water was measured will be resampled to verify that the final pH of the soil water was greater than 2 at all locations. This step will complete closure in compliance with 31 TAC, Section 335.286.

Once the inorganic impoundment is closed as a hazardous facility according to the preceding schedule, the concrete tank will be constructed in the approximate location of the inorganic impoundment. Following construction completion, demineralizer regenerant and boiler blowdown will be routed from the demineralizer impoundment to the new concrete tank. Work will then begin to close the demineralizer impoundment as a hazardous waste facility. The closure procedure for the demineralizer impoundment will be identical to that for the inorganic



impoundment with the exception of Step 3. If field sampling for pH dictates the necessity for clay liner neutralization, a caustic buffering solution of lime or sodium hydroxide at a pH of 9 will be added to fill the impoundment to a depth of approximately 0.5 feet. The buffering solution will remain in the impoundment for a minimum of 24 hours and then will be discharged to the wastewater treatment system. Following liquid caustic treatment, if resampling indicates that additional treatment is required, the clay liner will be limed and disked as described above in Step 3. Following liming and disking (if necessary), the liner will be resampled and recompactd for use of the impoundment as a nonhazardous facility.

The closure procedure described above has been developed assuming that any soil water which exhibits a pH of less than 2 will be limited to the shallow layer less than 1 foot below impoundment bottom. This assumption is supported by preliminary sediment analyses. An additional field survey of both impoundments will confirm these assumptions. If, however, pH values less than 2 persist at depths which make lime treatment and disking unfeasible, HL&P will remove the contaminated soil and dispose of it at a facility permitted to receive Class I materials. Following removal and additional sampling, liming and disking as described in Step 3 will be performed, if necessary.



FINAL CLOSURE OF THE IMPOUNDMENT SITES

After closure, both impoundments at the T. H. Wharton Generating Station will have been dewatered, and any soil below the site in which soil moisture exhibited a pH less than 2 will have been neutralized or removed with verification of no remaining hazardous materials by a final set of tests. Once these steps are certified as complete by an independent registered professional engineer, HL&P will submit to the state for declassification of the impoundments as hazardous waste treatment, storage, and disposal facilities, and reclassification of the remaining impoundment as a Class II facility. The inorganic impoundment will no longer exist. The ground-water monitoring program will be discontinued, except as may be required by the Ground-water Quality Assessment Plan, since the Wharton Station will be a hazardous waste generator only. Due to the closure procedures utilized, no additional post closure monitoring will be required.

Future site uses planned for the impoundments are to use the inorganic impoundment as the site for the concrete tank and to use the current demineralizer impoundment as a Class II facility to store boiler blowdown and, when generated, the nonhazardous portion of boiler condenser cleanings when hydrochloric acid is used.

The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

August 8, 1984

Mr. Allen L. Messenger, Head
Disposal Facilities Unit
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Messenger:

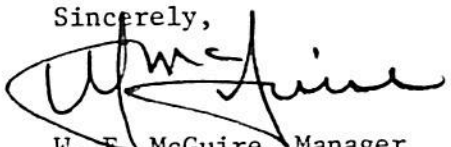
SUBJECT: T. H. WHARTON GENERATING STATION, TDWR NO. ~~1636~~
CLOSURE PLAN FOR HAZARDOUS WASTE SURFACE IMPOUNDMENTS

A closure plan for hazardous waste surface impoundments at this facility was submitted on April 16, 1984. A supplemental report, "Field Sampling and Laboratory Analysis of Hazardous Waste Surface Impoundments", was submitted on May 15, 1984, and provided additional information on the impoundment wastewaters and clay liners.

Your letter of June 26, 1984, discussed deficiencies in the closure plan and requested additional information for use in your evaluation. This information request was discussed with you and your staff by E. A. Feith and R. D. Groover (HL&P) in a meeting on July 6, 1984. This letter and attachments respond to your request and are intended to supplement and be made a part of the closure plan for hazardous waste surface impoundments at this facility.

Your expeditious review and response to the enclosed material will be appreciated. Please contact E. A. Feith (713) 922-2205 or R. D. Groover (713) 922-2195 if you have questions or desire to arrange a conference.

Sincerely,



W. F. McGuire, Manager
Environmental Protection Department

RDG/bwt

SUPPLEMENT TO
CLOSURE PLAN FOR TWO HAZARDOUS WASTE SURFACE IMPOUNDMENTS
AT THE T. H. WHARTON GENERATING STATION

Houston Lighting & Power Company
Houston, Texas

August, 1984

REGULATORY CONSIDERATIONS

HL&P intends to close the two hazardous waste surface impoundments (demineralizer and inorganic impoundments) in accordance with 31 TAC 335.469 by demonstrating that all hazardous waste constituents have either been removed, are not present, or are neutralized during the closure process. The sampling programs and other information presented herein are designed to fulfill this demonstration. The summary of waste constituents presented in Table 2 indicates no need to sample for Appendix VIII constituents other than EP metals toxicity analyses for silver and barium. Based on data previously collected, it is believed that for EP metals toxicity analyses will reveal no hazardous levels in the clay liners. As a conservative measure, additional core samples of the clay liner will be collected, but not analyzed unless the EP metals toxicity analyses of surface samples indicate hazardous levels.

Finally, a degree of flexibility is factored into the closure plan whereby different steps will be taken based upon the analytical results obtained during closure. Potential scenarios and the corresponding action plans are presented in Table 1.

Although no problems are anticipated in achieving closure, in the event that all hazardous constituents cannot be removed from the surface impoundment(s) or treated as specified in the closure plan, HL&P will notify the Executive Director (TDWR) that it is unable to certify compliance with the approved closure plan.

SAMPLING AND ANALYSIS DURING CLOSURE

A sampling program of the two hazardous waste impoundments will be implemented during closure to determine the condition of the clay liners. The basic plan will include soil pH and EP metals toxicity measurements of the

TABLE 1

POTENTIAL SAMPLING RESULTS AND PROPOSED PLAN OF ACTION DURING CLOSURE

pH Measurements of the Clay Liner		EP Metals Toxicity Measurements of the Clay Liner	
<u>Results</u>	<u>Action*</u>	<u>Results</u>	<u>Action</u>
no surface values < 2.5	° neutralize (liming/disking) to pH 6-9; verify with field measurements	° no EP metals toxicity values at hazardous levels in surface samples	° no action required
surface values < 2.5; 6-in. core samples > 2.5	° neutralize (liming/disking) to pH 6-9; verify with field core samples	° EP metals toxicity values are hazardous for one or more parameters in surface samples; no hazardous levels in 6-in core samples	° excavate top 6-in.; resample for EP metals toxicity to verify removal
surface values < 2.5; 6-in. core samples < 2.5	° verify depth of < 2.5 pH with deeper cores; excavate to remove contaminated layer; neutralize (liming/disking) to pH 6-9; verify with field surface and core samples	° EP metals toxicity values are hazardous in both surface and 6-in. core samples	° take deeper core samples to determine depth to which hazardous levels are present; excavate to remove hazardous constituents; verify removal with additional samples analyzed for metals toxicity

For the existing demineralizer impoundment, neutralization will first be attempted with liquid sodium hydroxide solution. If unsuccessful, liming/disking and/or excavation will be conducted as outlined herein.

clay liner surface in each impoundment. Core samples will be taken and analyzed for pH at any location where surface pH measurements are found to be below 2.5 pH. If EP metals toxicity analyses indicate the presence of metals at hazardous levels, 6-inch core samples taken at the same location will be analyzed for EP metals toxicity. The depth of soil neutralization and/or soil excavation will be determined based on the results of the surface and core soil sampling.

The following is a description of the number of samples, sampling locations, parameters and analytical methodology.

SAMPLING LOCATION/NUMBER OF SAMPLES

Each hazardous impoundment will be divided into four quadrants. From each quadrant, the following samples from the clay liner will be taken:

- 2 surface samples (pH)

- 1 surface sample (EP metals toxicity)

- 1 core sample (EP metals toxicity)

From the center of the impoundment the following samples will be taken:

- 2 surface samples (pH)

- 1 surface sample (EP metals toxicity)

- 1 core sample (EP metals toxicity)

Core samples for pH will only be taken where surface pH measurements are below 2.5.

PARAMETERS

The parameters selected for analysis include pH and EP metals toxicity. No additional Appendix VIII or 40 CFR 261 compounds are included in the sampling program. As shown in Table 2, silver nitrate and barium chloride (spent laboratory reagents) are the only Appendix VIII or 40 CFR 261 compounds present in any of the waste streams entering the hazardous impoundments. Measurement of EP metals toxicity will address any silver or barium residues remaining in the clay liner of the impoundments.

ANALYTICAL METHODOLOGY

The pH samples will be analyzed using a portable pH meter according to Section 150.1 of EPA Methods for the Analysis of Water and Wastewater EPA-6000/4-79-020.

EP metals toxicity samples will be analyzed according to Appendix II of 40 CFR.261.24.

NEUTRALIZATION

If field measurements of pH indicate neutralization is necessary, the clay liner of the inorganic metal cleaning waste impoundment will be neutralized by lime disking to obtain a pH level between 6 and 9. It has been determined that disking will be effective to a depth of eight inches. If 6-inch core samples show pH in the clay liner to be below 2.5 at a depth greater than six inches, the clay liner will be excavated to a depth sufficient to remove the contaminated materials and the remaining clay liner will be neutralized by lime disking to a pH level between 6 and 9. The results will be verified with field surface and core samples.

A flexible approach will be utilized in the field for neutralization of the current demineralizer surface impoundment. An attempt will initially be made to neutralize this impoundment with liquid sodium hydroxide to a pH level in the clay liner of between 6 and 9. It is not feasible to calculate the quantity of buffering solution required to neutralize the clay liner. If surface and 6- inch core samples of the clay liner indicate that liquid sodium hydroxide does not completely neutralize the liner to the depth required, liming and disking procedures will be followed as described above. As mentioned previously, eight inches is deemed an effective depth to lime disk. Any area of contamination deeper than eight inches will require excavation followed by field verification of pH values in surface and core samples.

DEMINERALIZER IMPOUNDMENT

As specified in the closure plan, the current demineralizer impoundment will, following closure, be used for boiler blowdown and, when generated, the nonhazardous portion of inorganic metal cleaning waste.

After the clay liner of the demineralizer impoundment has been neutralized and sampling verifies that the clay liner no longer contains hazardous constituents, soil permeability tests will be conducted to ensure proper recompaction of the clay liner. The permeability tests will be conducted with boiler blowdown water and will be used to demonstrate that the recompacted clay liner meets the guidelines for a Class II surface impoundment (TDWR Technical Guideline No.4).

WASTES ENTERING EACH IMPOUNDMENT

Table 2 lists the waste streams and volumes entering each impoundment and the chemical constituents of each waste stream. Based on a comparison of the process waste streams and their respective components to Appendix VIII and 40 CFR 261, pH and EP metals toxicity analyses are deemed sufficient to characterize the underlying clay liner of the impoundments.

TDWR PART A APPLICATION REVISION

The following sections of the Part A application have been updated and are shown in Attachment A.

Table III-1	Generated Hazardous Wastes and Management Activities
Table III-2	Hazardous Waste Management Facility Component Summary Sheets
Table III-4	Hazardous Waste Facilities Components List
Attachment G	Process Description for Hazardous Waste Streams

These revised sections accurately designate all current hazardous waste management units and hazardous wastes at the generating station.

The status of the remaining wastes/facility components listed in the original Part A, but not addressed in the closure plan, are also discussed in Attachment A. This discussion demonstrates that, after closure of the hazardous waste impoundments, waste management activities at the facility will not be subject to Part B permitting requirements.

CLASSIFICATION OF TANK

The concrete tank which will be built following closure of the hazardous waste surface impoundments will be a "wastewater treatment unit" as defined in 31 TAC Section 335.45. According to this definition, the tank will be subject to Section 402 or Section 307 (b) of the Federal Water Pollution Control Act as amended (33 USC 466 et seq.) and, therefore, can receive laboratory wastes. The tank will be exempt from solid waste permitting requirements under 31 TAC 335.41 (d)(1).

GROUNDWATER MONITORING

Results of groundwater quality assessment studies and future groundwater monitoring requirements were discussed with Mr. Paul Lewis, Enforcement and Field Operations Division, on July 25, 1984. It was agreed with Mr. Lewis that semiannual groundwater monitoring will be resumed with a sampling event conducted prior to November 19, 1984. An annual report, consisting of the groundwater data and appropriate statistical analysis, will be submitted shortly thereafter. Based on the data presented in the groundwater quality assessment study report and HL&P's intent to close the impoundments in accordance with 31 TAC 335.469 (a) (1), Mr. Lewis verified that post-closure groundwater monitoring will not be required at this facility. The monitoring wells will, however, be maintained in a functional condition.

NOTIFICATION

The following notifications will be made to Mr. Merton Coloton, Supervisor, TDWR, District 7:

- 1) The date closure will begin for each impoundment; and
- 2) The date semiannual groundwater sampling will be conducted.

This information will be provided in the event that observation and/or sampling coordination are desired by District 7 personnel.

CERTIFICATION

Sampling and closure certification of the impoundments will be conducted by an independent consulting firm. A registered professional engineer from this firm will certify that the impoundments have been closed in accordance with the specifications in the approved closure plan. This written certification will be submitted to TDWR.

TABLE 2

T. H. WHARTONDEMINERALIZER IMPOUNDMENT

<u>WASTE STREAM</u>	<u>CONSTITUENTS</u>	<u>APPROX. ANNUAL VOLUME (1983) (GALLONS)</u>
1) DEMINERALIZER REGENERANT	2-4% H ₂ SO ₄ AND/OR 6-8% NaOH REGENERATION RINSES RAINWATER POSSIBLY TRACE AMOUNTS OF THE FOLLOWING: CALCIUM SULFATE CHLORIDE IRON SILICA MAGNESIUM SODIUM COPPER	55,863,000*
2) ACID/CAUSTIC DRAINS (STORAGE TANKS AND DEMINERALIZER BUILDING)	H ₂ SO ₄ NaOH RAINWATER	UNKNOWN, VARIES WITH RAINFALL AND SPILLAGE
3) PLANT LABORATORY DRAIN		4,044.5 GALLONS** + 27 LBS (SOLID)
<u>ANALYSIS</u>	<u>REAGENTS</u>	<u>VOLUME/YEAR (MLS)</u>
DISSOLVED OXYGEN	INDIGO CARMINE INDICATOR (5,5'-INDIGODISULFONIC ACID) GLYCERINE 33.3% POTASSIUM HYDROXIDE	2,200 2,600 800
SILICA	(1:1) HYDROCHLORIC ACID 10% AMMONIUM MOLYBDATE 10% OXALIC ACID AMINO REDUCING AGENT (1-AMINO-2-NAPHTHOL-4-SULFONIC ACID IN SODIUM SULFITE AND SODIUM META-BISULFITE)	1,100 2,100 2,100 1,100

* TOTAL QUANTITY DISCHARGED FROM DEMINERALIZER IMPOUNDMENT UNDER NPDES.
REPRESENTS A TOTAL FOR ALL WASTE STREAMS LISTED HEREIN.

** ONLY 44.5 GALLONS OF THIS TOTAL CONSISTS OF REAGENTS.

<u>ANALYSIS</u>	<u>REAGENTS</u>	<u>VOLUME/YEAR (MLS)</u>
ALKALINITY	PHENOLPHTHALEIN INDICATOR (DISSOLVED IN ETHANOL)	1,300
	METHYL RED INDICATOR (DISSOLVED IN WATER)	800
	METHYL ORANGE INDICATOR (DISSOLVED IN WATER)	800
	0.1N SULFURIC ACID	10,500
	0.2N SULFURIC ACID	10,500
CALCIUM HARDNESS	0.5N SODIUM HYDROXIDE	2,600
	CALCIUM HARDNESS INDICATOR [1-(1-HYDROXYL-4-METHYL-2-PHENYLAZO)-2-NAPHTHOL-4-SULFONIC ACID]	1,100 GRAMS
	EDTA STANDARD SOLUTION (ETHYLENDIAMINETETRAACETIC ACID, DISODIUM SALT)	10,500
TOTAL HARDNESS	HARDNESS BUFFER REAGENT (SODIUM SULFIDE)	600 GRAMS
	HARDNESS INDICATOR [1-(1-HYDROXY-2-NAPHTHYLAZO)-6-NITRO-2-NAPHTHOL-4-SULFONIC ACID]	600 GRAMS
	EDTA STANDARD SOLUTION (ETHYLENDIAMINETETRAACETIC ACID, DISODIUM SALT)	10,500
CHLORIDE	.171N SILVER NITRATE*	2,100
	POTASSIUM CHROMATE INDICATOR	600
pH	6.86 pH BUFFER SALT	11,000
	7.00 pH BUFFER SOLUTION	3,000
	4.00 pH BUFFER SOLUTION	3,000
	9.18 pH BUFFER SALT	52,000
	10.04 pH BUFFER SALT	5,000
PHOSPHATE	PHOS VER 3 (DISSOLVED IN ASCBORIC ACID)	600 GRAMS
SULFATE	SULFA VER 4 (BARIUM CHLORIDE)**	2,500 GRAMS
PHOSPHANATE	POTASSIUM PERSULFATE	600 GRAMS
	PHOS VER 3 (ASCORBIC ACID)	1,100 GRAMS

* LISTED IN APPENDIX VIII: SILVER AND COMPOUNDS NOS

** LISTED IN APPENDIX VIII: BARIUM AND COMPOUNDS NOS

<u>ANALYSIS</u>	<u>REAGENTS</u>	<u>VOLUME/YEAR (MLS)</u>
TOTAL RESIDUAL CHLORINE	ACETATE BUFFER, 4 pH	55
	POTASSIUM IODIDE, 5%	55
	.00564N PHENYLARSINE OXIDE	20
FREE AVAILABLE CHLORINE	7.0 pH BUFFER	260
	.00564N PHENYLARSINE OXIDE	55
SILICA 1	SILICA 1	2,500
	(AMMONIUM MOLYBDATE AND SULFURIC ACID)	
	CITRIC ACID	2,500 GRAMS
	AMINO ACID	2,500 GRAMS
	(1-AMINO-2-NAPHTHOL-4-SULFONIC ACID IN SODIUM SULFITE AND SODIUM META-BISULFITE)	
COPPER	CU VER 1	800 GRAMS
	[2,2'-BIQUINOLINE-4,4'-DICARBOXYLIC ACID (BICINCHONINIC ACID)]	
	SODIUM POTASSIUM TARTRATE	1,700
ELIMINOX	SOLUTION #SO726	260
	(CARBOHYDRAZIDE)	
	SOLUTION #SO191	27,000
	(CARBOHYDRAZIDE)	
	SOLUTION #SO192	150
	(CARBOHYDRAZIDE)	
	SOLUTION #SO193	260
	(CARBOHYDRAZIDE)	
WATER DISCHARGE	CONSISTING OF: DISH WASHING; BOTTLED CWTS, STORAGE TANK, BOILER AND COOLING TOWER SAMPLES; DEMINERALIZED WATER FOR RINSING.	4,000 GALLONS

T. H. WHARTON

INORGANIC IMPOUNDMENT

<u>WASTE STREAM</u>	<u>CONSTITUENTS</u>	<u>APPROX. ANNUAL VOLUME (1983) (GALLONS)</u>
INORGANIC METAL CLEANING WASTE	3-5% HCL SOLUTION RINSES RAINWATER POSSIBLY TRACE AMOUNTS OF THE FOLLOWING: CALCIUM IRON CHLORIDE COPPER SODIUM NICKEL SULFATE ZINC	0*
BOILER BLOWDOWN	MONO-, DI-, TRI-SODIUM PHOSPHATES AND NALCO "ELIMINOX" (FLASHES TO HYDRAZINE) ARE USED AS BOILER WATER ADDITIVES. 7/16/84 SAMPLE RESULTS INDICATE THE FOLLOWING (MG/L): CARBONATE <1 BICARBONATE 3.1 HYDROXIDE <1 CHLORIDE 4.5 SULFATE <1 SILICATE 0.59 PHOSPHATE 0.04 TOC 3 ZINC <0.005 LEAD <0.1 CHROMIUM <0.1 NICKEL <0.2 CALCIUM 1.46 MAGNESIUM 0.04 SODIUM <0.01 IRON 0.35 MANGANESE <0.01 COPPER <0.01	14,103,000
ACID/CAUSTIC DRAINS (CWTS-STORAGE TANKS)	H ₂ SO ₄ NaOH RAINWATER	UNKNOWN, VARIES WITH RAINFALL AND SPILLAGE

* INORGANIC METAL CLEANING WASTE IS GENERATED INFREQUENTLY. QUANTITY
GENERATED IN 1980 WAS APPROXIMATELY 284,000 GALLONS.

ATTACHMENT A

"Part A Application Revisions"

T. H. Wharton Generating Station

Revised Part A Application

Appropriate tables/pages (attached) of the Part A application have been revised to reflect current hazardous waste management practices at T. H. Wharton Generating Station.

The Part A application prepared in August 1980 listed several wastes/facility components which have been removed in the revised Part A. These wastes/components are discussed below:

1. Demineralizer Regenerant Inorganic Sludge

This sludge accumulates at the bottom of the demineralizer impoundment from storage of demineralizer regenerant. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241470).

2. Metal Cleaning and Other Inorganic Sludge

This sludge accumulates at the bottom of the inorganic impoundment from storage of hydrochloric acid boiler and equipment cleanings, and boiler blowdown. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 241210).

3. Metal Cleaning Organic Acids/Metal Cleaning Organic Acids Collection Pond

This waste is generated from ammoniated citric acid or hydroxyacetic-formic acid boiler and equipment cleanings. It is stored in an impoundment prior to being injected in an energy-producing boiler for incineration. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 215290). The organic impoundment has, therefore, never received hazardous waste.

4. Metal Cleaning Organic Sludge

This sludge accumulates at the bottom of the organic impoundment. Based on EP toxicity analyses submitted to your office on April 8, 1981 (letter attached), this waste has been declassified to a Class II waste (TWC 248990).

5. Chemical Waste Treatment Sludge/Chemical Waste Treatment System & Sand Drying Beds

A concrete chemical waste treatment system is used to treat demineralizer regenerant, inorganic metal cleaning waste (when produced), and boiler blowdown prior to NPDES discharge. The sludge which accumulates in the settling chamber of the treatment system is

pumped to sand drying beds for dewatering and periodic off-site disposal. Based on EP toxicity analyses submitted to your office on February 23, 1981 (letter attached), this sludge has been declassified to a Class II waste (TWC 240540).

6. Waste Oil and Sludge/Waste Oil and Sludge Collection Facility

Oily sludge generated from the oily waste treatment system is classified as a Class I nonhazardous or Class II waste, depending on the amount of oil present in the sludge. The attached EP toxicity analyses of oily sludge indicate that no hazardous constituents are present.

7. Asbestos in Insulation

Insulation containing asbestos is classified as a Class I nonhazardous waste (TWC 170750). Asbestos, originally listed on the Part A application, has been delisted from the hazardous waste list (CFR 40.261).

T. H. Wharton Generating Station

Table III-1 Generated Hazardous Wastes and Management Activities

[illegible]

^a Total quantity discharged from demineralizer impoundment under NPDES permit.

^b Inorganic metal cleaning waste is generated infrequently. Quantity generated in 1980 was approximately 2.37×10^6 lbs. Total quantity discharged from demineralizer impoundment under NPDES permit.

1. "Storage" means the interim containment or control of waste after generation and prior to ultimate disposal.

“Processing” means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste so as to render such waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The “transfer” of solid waste for reuse or disposal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, ship, pipeline, or other means.

T. H. Wharton Generating Station

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Demineralizer Acid and Base Regeneration Wastewater</u>
Process (see last column in Table III-1)	<u>Water Treatment</u>
TDWR Sequence Number of Waste (if assigned)	<u>007, 008</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> 1 Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

T. H. Wharton Generating Station

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Inorganic Metal Cleaning Waste</u>
Process (see last column in Table III-1)	<u>Boiler & Condenser Cleaning</u>
TDWR Sequence Number of Waste (if assigned)	<u>010</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input checked="" type="checkbox"/> 1 Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input type="checkbox"/> Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

T. H. Wharton Generating Station

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Spent Solvents</u>
Process (see last column in Table III-1)	<u>Degreasing</u>
TDWR Sequence Number of Waste (if assigned)	<u>005</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input checked="" type="checkbox"/> 1 Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input checked="" type="checkbox"/> 1 Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input checked="" type="checkbox"/> 1 Other (specify <u>Mixed with</u>
<input type="checkbox"/> Landfill (other)	<u>waste oil for pickup by a)</u>
	<u>waste oil recycling firm</u>

T. H. Wharton Generating Station

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste	<u>Paint Thinner</u>
Process (see last column in Table III-1)	<u>Painting</u>
TDWR Sequence Number of Waste (if assigned)	<u>006</u>

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

<input type="checkbox"/> Lagoon/Pond (unlined)	<input type="checkbox"/> Landfarm
<input type="checkbox"/> Lagoon/Pond (lined)	<input type="checkbox"/> Landspreading Area
<input type="checkbox"/> Basin (earthen, above-grade lined)	<input type="checkbox"/> Spray Irrigation Area
<input type="checkbox"/> Basin (earthen, above-grade unlined)	<input type="checkbox"/> Flood Irrigation Area
<input type="checkbox"/> Basin (earthen, below-grade lined)	<input type="checkbox"/> Septic Tank/Drain Field
<input type="checkbox"/> Basin (earthen, below-grade unlined)	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Basin (concrete, above-grade lined)	<input type="checkbox"/> Tank (surface storage)
<input type="checkbox"/> Basin (concrete, above-grade unlined)	<input type="checkbox"/> Tank (sub-surface storage)
<input type="checkbox"/> Basin (concrete, below-grade lined)	<input type="checkbox"/> Tank (surface processing)
<input type="checkbox"/> Basin (concrete, below-grade unlined)	<input type="checkbox"/> Tank (sub-surface processing)
<input type="checkbox"/> Basin (other)	<input type="checkbox"/> Tank (other)
<input type="checkbox"/> Pit (lined)	<input type="checkbox"/> Drum Storage Area (open)
<input type="checkbox"/> Pit (unlined)	<input checked="" type="checkbox"/> 1 Drum Storage Area (enclosed)
<input type="checkbox"/> Incinerator	<input type="checkbox"/> Drum Storage Area (other)
<input type="checkbox"/> Open Controlled Incineration Area	<input type="checkbox"/> Bulk Storage Area (open)
<input type="checkbox"/> Boiler (energy-producing)	<input type="checkbox"/> Bulk Storage Area (enclosed)
<input type="checkbox"/> Landfill (sanitary)	<input type="checkbox"/> Bulk Storage Area (other)
<input type="checkbox"/> Landfill (surface, open)	<input type="checkbox"/> Other (specify _____)
<input type="checkbox"/> Landfill (other)	_____)

T. H. Wharton Generating Station

Table III-4 Hazardous Waste Facility Components List

Facility Component		Status		Design Capacity		Number of Years Utilized	Date in Service
Name	TDWR Seq. No.	Inactive	Active	(cu yds)	(gal)		
Lagoon/Pond (lined)	01		X		1,000,000	10	1974 1979 - (relined)
Verbal Description: Clay lined pond for the collection of demineralizer regeneration wastes prior to treatment.							
Treated wastewater is discharged via NPDES permit.							
Lagoon/Pond (lined)	02		X		1,000,000	10	1974 1979 (relined)
Verbal Description: Clay lined pond for the collection of metal cleaning inorganic acid wastes from boiler and equipment cleaning operations prior to treatment. Treated wastewater is discharged via NPDES permit.							
Boiler (Energy-producing)	03		X		NA	NA	NA
Verbal Description: Spent solvents are mixed with waste oil prior to incineration in the boiler.							
Drum Storage Area	05		X		NA	4	1980
Verbal Description: Drum storage area for the collection of waste paint thinner and spent solvents prior to off-site disposal.							
Verbal Description:							
Verbal Description:							

Attachment G

T. H. Wharton Generating Station

Process Description for Hazardous Waste Streams

1. Demineralizer Acid and Base Regeneration Wastewater (EPA Hazard Code C)

Demineralizer regenerant waste is collected in the demineralizer impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment and suspended solids removal. Treated wastewater is discharged in accordance with the NPDES permit.

2. Inorganic Metal Cleaning Waste (EPA Hazard Code C)

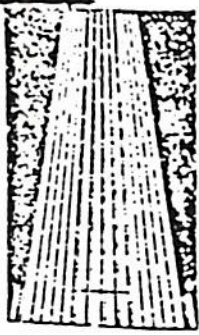
Inorganic metal cleaning waste is collected in the inorganic impoundment. The waste is then pumped to the chemical waste treatment system for pH adjustment, suspended solids and metals removal. Treated wastewater is discharged in accordance with the NPDES permit.

3. Spent Solvents (EPA Hazard Code I)

Spent solvents are collected in drums, mixed with waste oil for recycling, or incinerated in an energy-producing boiler.

4. Paint Thinner (EPA Hazard Code I, T)

Paint thinner waste is collected in drums. These drums are temporarily stored prior to off-site disposal.



Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

April 8, 1981

Mr. Jay Snow
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of the various waste streams and sludges generated at Houston Lighting & Power Company's generating stations. These waste streams and sludges were reported as being hazardous on our Part A, TDWR Hazardous Waste Registrations solely on the basis of Extraction Procedure (EP) Toxicity with the exception of metal cleaning inorganic acid waste, which was also listed on the basis of corrosivity, and demineralizer regenerant, which was listed only on the basis of corrosivity (See Attachment I).

The attached tables summarize the EP toxicity test results performed on each sample, including samples of demineralizer regenerant. The analyses were performed by our contract laboratory, Southern Petroleum Laboratories, and were done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. An attachment (Attachment II) has also been provided which identifies various abbreviations used in the summary tables to aid in your review.

The EP toxicity analytical data does not indicate the presence of toxic components in concentrations greater than the EP toxicity test limits. Therefore, as a result of our testing, we feel that those wastes previously considered hazardous due to EP toxicity should be declassified from the hazardous waste category.

It was stated above that two waste streams, demineralizer regenerant and metal cleaning inorganic acid wastes were listed as hazardous on the basis of corrosivity. The individual components that comprise each of these two waste streams when analyzed separately could result in pH values outside the specified range of the classification system. For example, if grab samples were taken of the cation and anion demineralizer regeneration wastes, the cation wastes could exhibit low pH values, and the anion wastes could exhibit high pH values.

Houston Lighting & Power Company

Mr. Jay Snow

April 8, 1981

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATIONS

However, a composite sample of all the demineralizer regeneration wastes, due to neutralization of the wastes, would be classified as simply solid wastes since the pH would fall between 2 and 12.5. The same type of example can be applied to metal cleaning inorganic acid waste as well, whereby the composite pH of the waste product would not qualify it as hazardous.

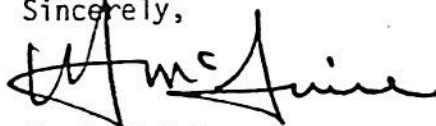
With respect to the corrosion of metals test to determine if a waste exhibits characteristics of corrosivity, many of the samples collected for EP toxicity analysis, including demineralizer regenerant and metal cleaning inorganic acid waste, were subjected to this test. The corrosivity analyses were performed in accordance with the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods." All samples indicated corrosion rates of less than 1 millimeter per year. This is substantially less than the 6.35 millimeter per year standard specified in the regulations.

It is also important to note that demineralizer regenerant and metal cleaning inorganic acid wastes are chemically treated and discharged under NPDES and TDWR wastewater discharge permits.

Considering the characteristics of demineralizer regenerant and metal cleaning inorganic acid waste described above and the corrosivity data, we do not feel that these two types of waste should be classified as hazardous waste prior to their treatment.

We therefore request declassification of all wastes specified in Attachment I. If you concur with our evaluation please notify us so that we can revise our Hazardous Waste Management program accordingly.

Sincerely,



W. F. McGuire, Manager
Environmental Protection Department

RTB/dhj

- Attachments -
- I. Waste Listing
 - II. Data Table Key
 - III. EP Toxicity Data Tables (six)
 - IV. Analytical Reports

ATTACHMENT I

HOUSTON LIGHTING & POWER COMPANY

WASTE LISTINGS

<u>WASTE DESCRIPTION</u>	<u>BASIS for LISTING AS HAZARDOUS</u>
Demineralizer Regenerant	C
Demineralizer Regenerant Inorganic Sludge	E
Metal Cleaning Inorganic Acids	EC
Metal Cleaning Inorganic Sludge	E
Metal Cleaning Organic Acids	E
Metal Cleaning Organic Sludge	E

C - Corrosive

E - E.P. Toxicity

ATTACHMENT II

HOUSTON LIGHTING & POWER COMPANY

DATA TABLE KEY

<u>PLANT NAME</u>	<u>PLANT ABBREVIATION</u>	<u>TDWR SOLID WASTE REGISTRATION NO.</u>
S. R. BERTRON	SRB	31637
CEDAR BAYOU	CBY	31639
H. O. CLARKE	HOC	31635
DEEPWATER	DWP	31632
GREENS BAYOU	GBY	31634
W. A. PARISH	WAP	31631
P. H. ROBINSON	PHR	31638
WEBSTER	WEB	31633
T. H. WHARTON	THW	31636

For some of the waste sampled there exists more than one set of data. This is due to one of two reasons; 1) sample collections representing different dates; 2) sample collections representing more than one storage/treatment facility for that particular type of waste. These samples are denoted by their direction relative to one another (N,S,E,W) or by number notation.

ATTACHMENT III

EP TOXICITY DATA TABLES

Houston Lighting & Power Company
Hazardous Waste Management-Waste Analysis
Demineralizer Regenerant (Liquid)

P Toxicity (ppm)	SRB	CBY	HOOC	DWP	GBY	WAP	PHR	WEB	THW
enic	<0.05	<0.05	<0.05	<0.05 (N) <0.05 (S)	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05
um	<0.05	<0.05	<0.5	<0.5 <0.05	<0.05	<8.1	1.3	<0.05 <0.05	9.5
um	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05	<0.05	<0.05	<0.05 <0.05	0.07
omium	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
id	<0.1	<0.1	<0.1	<0.1 <0.1	<0.1	<0.1	<0.1	<0.1 <0.1	<0.1
cury	<0.005	<0.005	<0.005	<0.005 <0.005	<0.005	<0.005	<0.005	<0.005 <0.005	<0.00
enium	<0.02	<0.02	<0.02	<0.02 <0.02	<0.02	<0.05	<0.05	<0.05 <0.02	<0.05
ver	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05	<0.05	<0.05	<0.05 <0.05	<0.05
irin	<0.02	<0.02	<0.02	<0.02 <0.02	<0.02	<0.02	<0.02	<0.02 <0.02	<0.02
idane	<0.4	<0.4	<0.4	<0.4 <0.4	<0.4	<0.4	<0.4	<0.4 <0.4	<0.4
thoxychlor	<1	<1	<1	<1 <1	<1	<1	<1	<1 <1	<1
aphene	<0.5	<0.5	<0.5	<0.5 <0.5	<0.5	<0.5	<0.5	<0.5 <0.5	<0.5
chlorophenoxyacetic	<1	<1	<1	<1 <1	<1	<1	<1	<1 <1	<1

Houston Lighting & Power Company
Hazardous Waste Management-Waste Analysis
Demineralizer Regenerant (Sludge)

TP Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
nic	<0.9	<1.0		<0.05	<0.05		<0.05	<0.05	<0.05
um	<1.7	<2.0		28.5	1.1		4.0	<0.1	<11.9
ium	<0.9	<1.0		<0.05	<0.05		<1.0	<0.05	<0.05
ium	<0.9	<1.0		<0.05	<0.05		<1.0	<0.05	<0.05
	<1.7	<2.0		<1	<0.1		<2.0	<0.1	<0.1
ury	<0.009	<0.01		<0.005	<0.005		<0.01	<0.005	<0.005
enium	<0.09	<1.0		<0.05	<0.05		<0.05	<0.05	<0.05
er	<0.09	<1.0		<0.05	<0.05		<1.0	<0.05	<0.05
rin	<0.02	<0.02		<0.02	<0.02		<0.02	<0.02	<0.02
dane	<0.4	<0.04		<0.04	<0.4		<0.4	<0.4	<0.4
hoxychlor	<1	<1		<1	<1		<1	<1	<1
aphene	<0.5	<0.5		<0.5	<0.5		<0.5	<0.5	<0.5
hlorophenoxyacetic	<1	<1		<1	<1		<1	<1	<1

[illegible]

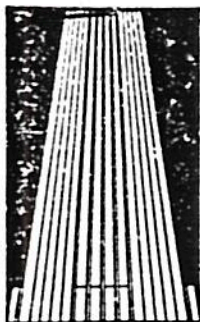
[illegible]

Houston Lighting & Power Company
Hazardous Waste Management-Waste Analysis
Organic Acid (Liquid)

Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
nic	<0.05	<0.05 (W) <0.05 (S)		<0.05	<0.05 (N) <0.05 (S)	<0.05 (#2) <0.05 (#1)	<0.05	<0.05	<0.05
um	1.19	13.5 42 <0.5		<0.5	8.9 <0.05	11.5 <0.05	<0.1	0.12	1.1
ium	<0.05	<0.05 <0.05 <0.05		<0.05	<0.05 <0.05	<0.05 2.89	<0.05	<0.05	<0.05
mium	<0.05	<0.05 <0.05 <0.05		<0.05	<0.05 <0.1	3.75 <0.1	<0.05	<0.05	<0.05
l	<0.1	<0.1 <0.1 <0.1		<0.1	<0.1 <0.005	<0.1 <0.005	<0.1	<0.10	<0.1
ury	<0.005	<0.005 <0.005 <0.005		<0.005	<0.005 <0.05	<0.005 <0.02	<0.005	<0.005	<0.005
mium	<0.02	<0.05 <0.05 <0.05		<0.05	<0.05 <0.05	<0.02 <0.5	<0.05	<0.05	<0.05
ver	<0.05	<0.05 <0.1 <0.05		<0.05	<0.05 <0.05	<0.05 <0.05	<0.05	<0.05	<0.05
rin	<0.02	<0.02 <0.02 <0.02		<0.02	<0.02 <0.4	<0.02 <0.4	<0.02	<0.02	<0.02
dane	<0.4	<0.4 <0.4 <0.4		<0.4	<0.4 <1	<0.4 <1	<0.4	<0.4	<0.4
hoxychlor	<1	<1 <1 <1	H. O. Clarke does not store organic acid.	<1.0	<1 <0.5	<1 <0.5	<1	<1.0	<1
aphene	<0.5	<0.5 <0.5 <0.5		<0.5	<0.5 <1	<0.5 <1	<0.5	<0.5	<0.5
hlorophenoxyacetic	<1	<1 <1 <1		<1.0	<1 <1	<1 <1	<1	<1	<1

Houston Lighting & Power Company
Hazardous Waste Management-Waste Analysis
Organic Acid (Sludge)

P Toxicity (ppm)	SRB	CBY	HOC	DWP	GBY	WAP	PHR	WEB	THW
enic	<1.0	<1.0		<0.05	<0.05(N) <0.05(S)		<0.05	<0.05	<0.05
um	32.7	<2.0 59		3.6	8.1 7.9		79.7	7.5	12.4
nium	<1.0	<1.0 <1.0		<0.05	<0.05 <0.05		<0.05	<0.05	<0.05
onium	<1.0	<1.0 <1.0		<0.05	<0.05 <0.05		0.28	<0.05	<0.05
d	<2.0	<2.0 <2.0		<0.1	<0.1 <0.1		<0.1	<0.1	<0.1
cury	<0.01	<0.01 <0.01		<0.005	<0.005 <0.005		<0.005	<0.005	<0.005
enium	<1.0	<1.0 <1.0		<0.05	<0.05 <0.05	NA	<0.05	<0.05	<0.05
ver	<1.0	<1.0 <1.0		<0.05	<0.05 <0.05		<0.05	<0.05	<0.05
rin	<0.02	<0.02 <0.02		<0.02	<0.02 <0.02		<0.02	<0.02	<0.02
dane	<0.4	<0.4 <0.4		<0.4	<0.4 <0.4		<0.4	<0.4	<0.4
hoxychlor	<1	<1 <1		<1	<1 <1		<1	<1	<1
aphene	<0.5	<0.5 <0.5		<0.5	<0.5 <0.5		<0.5	<0.5	<0.5
hlorophenoxyacetic	<1	<1 <1		<1	<1 <1		<1	<1	<1
		<1			<1				



Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

February 23, 1981

Mr. Jay Snow
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

SUBJECT: INDUSTRIAL SOLID WASTE RECLASSIFICATION
MISCELLANEOUS INORGANIC SLUDGES
TDWR WASTE CODE NOS. 140540 and 240540

Pursuant to requirements set forth under RCRA, we have analyzed representative samples of inorganic sludge collected from sludge drying beds at stations where sludge drying beds exist. The sludge originates from chemical waste treatment systems associated with our power plants, and was reported as being hazardous on our Part A, TDWR Hazardous Waste permit applications on the basis of EP Toxicity. Presently on our TDWR Solid Waste Registrations this inorganic sludge is classified as either a Class I or Class II Solid Waste.

The attached table summarizes the EP toxicity test results performed on each sludge sample. The analysis was performed by our contract laboratory, Southern Petroleum Laboratories, and was done in accordance with the extraction procedures outlined by the EPA in Part 261, Appendix II of the Hazardous Waste Regulations. As a basis for comparison, column I of the table represents the test results of sludge from the cooling tower clarifier at our Greens Bayou Generating Station. This sludge has a Class III classification.

Based on the results identified in the table we believe that the inorganic sludge from our chemical waste treatment systems should be classified as Class III waste material as is the sludge from the cooling tower clarifier.

If you concur with this reclassification please notify us so that we can inform our personnel who handle this material.

Sincerely,

D. B. Chin
Principal Engineer, Water Quality
Environmental Protection Department

RTB/dhj
Attachment

HOUSTON LIGHTING & POWER COMPANY
Inorganic Sludge EP Toxicity Test Results

	TDWR # 31634 Greens Bayou Cooling Tower Blowdown	TDWR # 31639 Cedar Bayou	TDWR # 31632 Deepwater	TDWR # 31633 Webster	TDWR # 31636 T.H.Wharton (South)	TDWR # 31636 T.H.Wharton (North)
Class III						
senic.	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
rium	<1.0	21	<1.0	<2.1	<1.0	<1.0
dmium	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
romium	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
ad	<0.10	<0.10	<0.10	<0.10	<0.10	<0.05
rcury	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
lenium	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
lver	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
idrin	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
ndane	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40
thoxychlor	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
xaphene	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50
ichlorophenoxyacetic	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0



SOUTHERN PETROLEUM LABORATORIES, INC.

P.O. BOX 20807
HOUSTON, TX 77025

P.O. BOX 52768
LAFAYETTE, LA 70505

P.O. BOX 10276
JEFFERSON, LA 70181

P.O. BOX 378
ACME, MI 49610

Certificate Number 045710
Invoice Number 123528
April 01, 1982

Houston Lighting & Power Company
Energy Development Complex
Room C 275
P.O. Box 1700
Houston, Texas 77001

Attention: Mr. R. T. Bye

Sample Description: THW
tricellulator waste
API separator waste oil
Date Sampled: 03/03/82
Date Received: 03/18/82

			<u>Date</u>	<u>Time</u>	<u>Analyst</u>
<u>Trichlorophenoxypropionic</u>	< 1.0	<u>mg/l</u>	03/31/82	8:00 am	JM
<u>Dichlorophenoxyacetic</u>	< 1.0	<u>mg/l</u>	03/31/82	8:00 am	JM
<u>Silver total</u> EPA storet number 01077	< 0.05	<u>mg/l</u>	03/24/82	3:00 pm	KES
<u>Arsenic total</u> EPA storet number 01002	< 0.05	<u>mg/l</u>	03/26/82	8:00 am	KES
<u>Barium total</u> EPA storet number 01007	< 0.1	<u>mg/l</u>	03/25/82	3:00 pm	KES
<u>Cadmium total</u> EPA storet number 01027	< 0.05	<u>mg/l</u>	03/24/82	3:00 pm	KES
<u>Corrosivity</u>	< 1	<u>mmpy</u>	03/19/82	4:00 pm	DD
<u>Chromium total</u> EPA storet number 01034	< 0.05	<u>mg/l</u>	03/24/82	11:30 am	KES
<u>Endrin</u>	< 0.02	<u>mg/l</u>	03/31/82	8:00 am	JM
<u>Flash Point</u>	> 210	<u>degF</u>	03/22/82	8:00 am	SRG
<u>Mercury total</u> EPA storet number 71900	< 0.005	<u>mg/l</u>	03/25/82	1:00 pm	KES



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JEFFERSON, LA 70181

P.O. BOX 378
ACME, MI 49610

Certificate Number 045710, page 2
Houston Lighting & Power Company

<u>Lindane</u>	< 0.4	<u>mg/l</u>	03/31/82	8:00 am	JM
<u>Methoxychlor</u>	< 1	<u>mg/l</u>	03/31/82	8:00 am	JDM
<u>Lead total</u> EPA storet number 01051	< 0.1	<u>mg/l</u>	03/24/82	10:00 am	KES
<u>Selenium total</u> EPA storet number 01147	< 0.05	<u>mg/l</u>	03/24/82	10:00 am	KES
<u>Toxaphene</u>	< 0.5	<u>mg/l</u>	03/31/82	8:00 am	JM

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: comparisons against known standards in each run, one in ten sample splits, and a quarterly method review against known spike samples.

SOUTHERN PETROLEUM LABORATORIES, INC.

Sammy Russo
Sammy Russo

REPORTS

FACILITY ID TXD 000837351

NEW ENTRY +

CHANGE ENTRY

DELETE ENTRY

PERMIT NO 1

ACTION CODE C2402 = 01

SEQUENCE NO

DATE DUE

ACTION DATE 04/04/01

STATUS CODE

RESPONSIBLE AGENCY S

RESPONSIBLE PERSON mas

FREE FIELD 1

FREE FIELD 2

FREE FIELD 3

FREE FIELD 4

FREE FIELD 5

FREE FIELD 6

1-15-85

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO

PERMIT ACTION LINK CHANGED FROM TO

DELETE PERMIT ACTION LINK TO

PERMIT ISSUANCE TRACKING

FACILITY ID

NEW ENTRY

CHANGE ENTRY

DELETE ENTRY

PERMIT NO

ACTION CODE

SEQUENCE NO

DATE DUE

ACTION DATE

STATUS CODE

FREE FIELD 1

FREE FIELD 2

FREE FIELD 3

FREE FIELD 4

FREE FIELD 5

FREE FIELD 6

RESPONSIBLE AGENCY

RESPONSIBLE PERSON

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO

The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

NOV 14 1985

November 6, 1985

Mr. Minor Hibbs
Hazardous & Solid Waste Div.
Texas Water Commission
Post Office Box 13087
Capitol Station
Austin, Texas 78711

SUBJECT: CERTIFICATION OF CLOSURE (31 TAC, SECTION 335.216)
AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING
Greens Bayou Generating Station, TWC No. 31634

Dear Mr. Hibbs:

Certification is hereby made that the hazardous waste surface impoundment identified as facility number 02 on the Notice of Registration has been closed in accordance with the closure plan submitted by letters dated April 16, 1984, and August 8, 1984, and approved by the TWC on September 17, 1984. Enclosed is a certification of closure for this facility by an independent registered professional engineer.

Certification is also hereby made that the hazardous waste container storage area identified as facility number 06 on the Notice of Registration has been closed in accordance with the closure plan submitted on May 13, 1985, and approved by the TWC on September 23, 1985. Enclosed is a certification of closure for this facility by an independent registered professional engineer.

These closures constitute full facility closure of all hazardous waste units at Greens Bayou. Therefore, a signed and notarized Affidavit of Exclusion from Hazardous Waste Permitting is enclosed for your processing.

Class I hazardous wastes identified on the facility's current solid waste registration are handled as follows:

- a. Paint thinner - drum storage onsite for less than 90 days; shipment offsite for disposal.
- b. Mercury-contaminated waste - drum storage onsite for less than 90 days; shipment offsite for disposal.

Houston Lighting & Power Company

Mr. Minor Hibbs
November 6, 1985
Page 2

- c. Hydrazine - drum storage onsite for less than 90 days; shipment offsite for disposal.
- d. Spent solvents - drum storage onsite for less than 90 days followed by shipment offsite for disposal; or, small amounts mixed with waste oil and sold to a recycler; or, incineration in the generating station's high-efficiency boiler.
- e. Sandblast grit - container storage onsite for less than 90 days; shipment offsite for disposal.
- f. Inorganic metal cleaning waste - when generated, the hazardous portion is routed to a separate compartment in a fiberglass-lined concrete tank prior to treatment and discharge as per NPDES permit requirements. The tank meets the RCRA permit exemption requirements as defined in 40 CFR 264.1.
- f. Demineralizer acid and base regenerant wastewater - routed to a fiberglass-lined concrete tank prior to treatment and discharge as per NPDES permit requirements. The tank meets the RCRA permit exemption requirements as defined in 40 CFR 264.1.

If you have any questions regarding this matter, please contact Dr. R. D. Groover at 713/922-2195.

Sincerely,



W. F. McGuire
Manager, Environmental Protection
Department

RDG/rmr
Attachment

cc: Texas Water Commission, District 7 (Deer Park, Texas)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

File II A.6.
LOUIS 14
FEB 28 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Houston Light and Power
TH Wharton Genr Station
P.O. Box 1700
Houston, TX 77001
ID #TXD000837351

RE: Request for Information Pursuant to §3007 of the Resource
Conservation and Recovery Act, 42 U.S.C. §6927

Dear Sirs:

In August 1985, the Environmental Protection Agency (EPA) sent your company a letter to advise you that the Resource Conservation and Recovery Act of 1976 (RCRA) had been amended by the Hazardous and Solid Waste Amendments of 1984 (the Amendments), and in particular, to inform you of a new provision known as the loss of interim status provision. The purpose of this letter is to provide additional guidance relative to the loss of interim status provision and to request information regarding your operations before and after November 8, 1985.

The loss of interim status provision states:

(2) In the case of each land disposal facility which has been granted interim status under this subsection before the date of enactment of the Hazardous and Solid Waste Amendments of 1984, interim status shall terminate on the date [November 8, 1985] twelve months after the date of the enactment [November 8, 1984] of such Amendments unless the owner or operator of such facility-

(A) applies for a final determination regarding the issuance of a permit under subsection (c) for such facility before the date twelve months after the date of the enactment of such Amendments; and

(B) certifies that such facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements.

The EPA's interpretation of the requirement under this provision is published at 50 Federal Register 38946 (September 25, 1985), a copy of which is enclosed. Please read and follow this closely. In order for

P - C - L - W HEADER

BB 32786

HL dp

P - C - L - W HEADER

FACILITY ID: TXD 000837351NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

01

(C2001) HEADER TYPE: C(C2002) HEADER TYPE SEQ NO: 01HEADER PROCESS TYPE: C
(C2003)R/S/C IND: R
(C2051)DATE COVERAGE EFFECTIVE: -----
(C2004)

(C2052) STORAGE	APPLICABLE	PROCESS AMOUNT (C2053)	UNITS (C2054)
(S01) CONTAINERS	-	-----	-
(S02) TANKS	-	-----	-
(S03) WASTE PILES	-	-----	-
(S04) SURFACE IMPOUNDMENTS	<input checked="" type="checkbox"/>	<u>6,000,000</u>	<u>G</u>
DISPOSAL			
(D79) INJECTION WELL	-	-----	-
(D90) LANDFILLS	-	-----	-
(D81) LAND APPLICATION	-	-----	-
(D82) OCEAN	-	-----	-
(D83) SURFACE IMPOUNDMENTS	-	-----	-
TREATMENT			
(T01) TANKS	<input checked="" type="checkbox"/>	<u>24,000</u>	<u>U</u>
(T02) SURFACE IMPOUNDMENTS	-	-----	-
(T03) INCINERATORS	-	-----	-
(T04) OTHER	-	-----	-

P - C - L - W TRACKING

BB 32786

HL & P.

NS 5.13.8L

P - C - L - W TRACKING

FACILITY ID: TYD 000837351NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: 26HEADER TYPE SEQ NO: 01
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840602

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

HLKP

BB 32786

NS 5-13-86

P - C - L - W TRACKING

FACILITY ID: TXD 000837351NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: 01HEADER TYPE SEQ NO: 01
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840416

STATUS CODE: --

FREE FIELD 1: -
FREE FIELD 4: ---FREE FIELD 2: --
FREE FIELD 5: ---FREE FIELD 3: ---
FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

TWC ID

3/636

P - C - L - W TRACKING

BB 32786

HLEP

NS 5-13-86

P - C - L - W TRACKING

FACILITY ID: TAD 000837357

NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: 12HEADER TYPE SEQ NO: 2L
TRACKING SEQ NO: 2L

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840917

STATUS CODE: --

FREE FIELD 1: -
FREE FIELD 4: ---FREE FIELD 2: --
FREE FIELD 5: ---FREE FIELD 3: ---
FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

1-2

02/21 14:39

7304324

#02

P - C - L - W TRACKING

P - C - L - W TRACKING

FACILITY ID: TxD000837351

~~X~~
DELETE ENTRY

NEW ENTRY -

CHANGE ENTRY -

HEADER TYPE: 03
ACTION ITEM: 03

HEADER TYPE SEQ NO: 02
TRACKING SEQ NO: 02

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840416

STATUS CODE: --

FREE FIELD 1: -
FREE FIELD 4: ---

FREE FIELD 2: --
FREE FIELD 5: ---

FREE FIELD 3: --
FREE FIELD 6: --

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----
PERMIT ACTION LINK CHANGED FROM ----- TO -----
DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

P - C - L - W TRACKING

FACILITY ID: TxD000837351

NEW ENTRY -

CHANGE ENTRY -

DELETE ENTRY ^X

HEADER TYPE: 02
ACTION ITEM: 02

HEADER TYPE SEQ NO: 01
TRACKING SEQ NO: 02

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840917

STATUS CODE: -

FREE FIELD 1: -
FREE FIELD 4: ---

FREE FIELD 2: --
FREE FIELD 5: ---

FREE FIELD 3: -
FREE FIELD 6: -

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----
PERMIT ACTION LINK CHANGED FROM ----- TO -----
DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

P - C - L - W TRACKING

FACILITY ID: TXD000837351

X
DELETE ENTR

NEW ENTRY -

CHANGE ENTRY -

HEADER TYPE: -
ACTION ITEM: 06

HEADER TYPE SEQ NO: --
TRACKING SEQ NO: 02

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840602

STATUS CODE: -

FREE FIELD 1: -
FREE FIELD 4: ---

FREE FIELD 2: --
FREE FIELD 5: ---

FREE FIELD 3:
FREE FIELD 6:

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----
PERMIT ACTION LINK CHANGED FROM ----- TO -----
DELETE PERMIT ACTION LINK TO -----

✓
RC 2/15/86
2/15/86
JAD

C-1.0 HOUR
File # A6
ATTACHMENT III

LOSS OF INTERIM STATUS
REGION VI EPA
R06-01-06

1. Reviewer: DGS/SAF
2. Facility name: HOUSTON LIGHTING & POWER - WHARTON GEN. STA
3. Address/location: P.O. BOX 1700
HOUSTON, TX. 77001

4. EPA I.D. No.: TXD 000 837351

5. Type of RCRA units
requiring certification:

TDWR# 31636

- (2) METAL CLEANING ORGANIC
- * A. S.I. - ACIDS COLLECTION POND H. _____
DEMNERALIZER REGENERANT
- * B. S.I. - COLLECTION POND I. _____
- C. _____ J. _____
- D. _____ K. _____
- E. _____ L. _____
- F. _____ M. _____
- G. _____ N. _____

* Q. 22

Yes No Not
Determined

6. Is groundwater certification
required? If yes, continue to
Question 7. If no, go to Question
22.
7. Is financial assurance certifica-
tion required? If yes, continue
to Question 3. If no, go to
Question 22.

☐ ☒ ☐

☐ ☒ ☐

	Yes	No	Not Determined
8. Was groundwater certification submitted? If yes, continue to Question 9. If no, answer Questions 9, 10, 11, and 12, and go to Question 20.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Was financial assurance certification submitted? If yes, continue to Question 10. If no, answer Questions 10, 11, and 12 and go to Question 20.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Is signature adequate? If yes, continue to Question 11. If no, answer Questions 11 and 12 and go to Question 22.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Documentation available?			
a. Part A Submittal - Date: <u>11/19/80</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Part B Submittal - Date: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Topographic Map -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Section 3007 Response - Date: _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Closure Plan - Date: <u>9/24</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Post-Closure Plan - Date: <u>Clean Close</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. RCRA Inspection - Date: <u>1/16/85</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Other - Signed _____	Received _____		
i. <u>Certification</u> Date: _____			
ii. _____ Date: _____			
iii. _____ Date: _____			
iv. _____ Date: _____			
v. _____ Date: _____			
12. Do all documents listed in Question 11 agree with the information shown in Question 5? If yes, continue to Question 13. If no, go to Question 22 and check with Project Manager before continuing with questionnaire.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Does groundwater certification properly address all units listed in Question 5? If yes, continue to Question 14. If no, go to Question 22.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No	Not Determined
14. Does financial assurance certification (insurance and closure/post-closure) properly address all units listed in Question 5? If yes, continue to Question 15. If no, go to Question 22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Q. 22		
15. Does insurance address both sudden and non-sudden occurrences? If yes, continue to Question 16. If no, go to Question 22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Which of the following options were used to demonstrate financial assurance for closure? Note: check yes for the appropriate method - it is not necessary to check No for those which do not apply.	<u>Closure Cost</u>	<u>Insurance Part B</u>	<u>Available</u>
a. Closure trust fund:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Surety bond guaranteeing payment into a closure trust fund:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Surety bond guaranteeing performance:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Closure letter of credit:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Closure insurance:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Financial test/corporate guarantee:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Multiple financial mechanisms:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Which of the following options were used to demonstrate financial assurance for post-closure? Note: Check yes for the appropriate method - it is not necessary to check no for those which do not apply.	<u>POST CLOSURE COST</u>	<u>Insurance Part B</u>	<u>Available</u>

- | | Yes | No | Not
Determined |
|--|--------------------------|--------------------------|--------------------------|
| a. Post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Surety bond guaranteeing payment into a post-closure trust fund: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Surety bond guaranteeing performance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Post-closure letter of credit: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Insurance: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Financial test/corporate guarantee: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Multiple financial mechanisms: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. ^{GROUNDWATER} Is certification considered complete? If no, explain in Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Is financial assurance considered complete? If no, explain in Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 20. If the answer to Questions 8, 9, 18, or 19 is no, was a closure plan submitted? If yes, continue to Question 21. If no, go to Question 22. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 21. If the answer to Questions 8, 9, 18, or 19 is no, was a post-closure plan submitted? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 22. Briefly discuss the problems or discrepancies identified and determine if they are of a nature which prevents further review. | | | |

These units have been closed & certified by a
Registered P.E.
TWDR certified financial assurance & suddenness-sudden
insurance on 4/23/85.

P - C - L - W TRACKING

NS 6.10.86

P - C - L - W TRACKING

FACILITY ID: ~~TXD 000837351~~

NEW ENTRY -

CHANGE ENTRY -

DELETE ENTRY ~~X~~

HEADER TYPE: ~~P~~
ACTION ITEM: ~~32~~

HEADER TYPE SEQ NO: ~~01~~
TRACKING SEQ NO: ~~01~~

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: ~~841217~~

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.86

P - C - L - W TRACKING

FACILITY ID: TXD000837351

NEW ENTRY -

CHANGE ENTRY -

DELETE ENTRY ☒

HEADER TYPE: C
ACTION ITEM: 12

HEADER TYPE SEQ NO: 02
TRACKING SEQ NO: 02

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 851029

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.86

P - C - L - W TRACKING

FACILITY ID: TxD000837351

NEW ENTRY X

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: LS

HEADER TYPE SEQ NO: 02
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: S

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 851029

STATUS CODE: S

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.86

P - C - L - W TRACKING

FACILITY ID: TXD 000837351

NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: P
ACTION ITEM: 32

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 84/2/11

STATUS CODE: AR

FREE FIELD 1: -

FREE FIELD 2: -- -

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

Certified closure

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.86

P - C - L - W TRACKING

FACILITY ID: TXD 000 837351

NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: P
ACTION ITEM: 33

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 840401

STATUS CODE: EE

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

Non Regulated Units

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W HEADER

FACILITY ID: TXD 000837351

NEW ENTRY ~~X~~ CHANGE ENTRY -HEADER TYPE: ~~-~~

DELETE ENTRY -

HEADER TYPE SEQ NO: 03

HEADER PROCESS TYPE: - R/S/C IND: ~~S~~ DATE COVERAGE EFFECTIVE: -----

	APPLICABLE	PROCESS AMOUNT	UNITS
STORAGE			
(S01) CONTAINERS	-	-----	-
(S02) TANKS	X	-----3000-----	G
(S03) WASTE PILES	-	-----	-
(S04) SURFACE IMPOUNDMENTS	-	-----	-
DISPOSAL			
(D79) INJECTION WELL	-	-----	-
(D80) LANDFILLS	-	-----	-
(D81) LAND APPLICATION	-	-----	-
(D82) OCEAN	-	-----	-
(D83) SURFACE IMPOUNDMENTS	-	-----	-
TREATMENT			
(T01) TANKS	X	-----1699200.-----	U
(T02) SURFACE IMPOUNDMENTS	-	-----	-
(T03) INCINERATORS	-	-----	-
(T04) OTHER	-	-----	-

P - C - L - W HEADER

FACILITY ID: TXD000837351

NEW ENTRY ☒ CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C

HEADER TYPE SEQ NO: 03

HEADER PROCESS TYPE: - R/S/C IND: S DATE COVERAGE EFFECTIVE: -----

	APPLICABLE	PROCESS AMOUNT	UNITS
STORAGE			
(S01) CONTAINERS	<input checked="" type="checkbox"/>	1801.000	67
(S02) TANKS	-	-----	-
(S03) WASTE PILES	-	-----	-
(S04) SURFACE IMPOUNDMENTS	-	-----	-
DISPOSAL			
(D79) INJECTION WELL	-	-----	-
(D80) LANDFILLS	-	-----	-
(D81) LAND APPLICATION	-	-----	-
(D82) OCEAN	-	-----	-
(D83) SURFACE IMPOUNDMENTS	-	-----	-
TREATMENT			
(T01) TANKS	-	-----	-
(T02) SURFACE IMPOUNDMENTS	-	-----	-
(T03) INCINERATORS	-	-----	-
(T04) OTHER	-	-----	-

P - C - L - W TRACKING

125610-86

P - C - L - W TRACKING

FACILITY ID: TXD000837351

NEW ENTRY X

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: 03

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 850513

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

Additional Closure Plan

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.85

P - C - L - W TRACKING

FACILITY ID: TXD000837351

NEW ENTRY X

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: 06

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 850816

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.86

P - C - L - W TRACKING

FACILITY ID: TxD000837351

NEW ENTRY ☒

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: 20

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 850923

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

AIS 6.10.86

P - C - L - W TRACKING

FACILITY ID: TXD 000837351

NEW ENTRY ~~X~~

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: e
ACTION ITEM: 12

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 85/030

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

P - C - L - W TRACKING

NS 6.10.26

P - C - L - W TRACKING

FACILITY ID: TXD000837351

NEW ENTRY X

CHANGE ENTRY -

DELETE ENTRY -

HEADER TYPE: C
ACTION ITEM: LS

HEADER TYPE SEQ NO: 03
TRACKING SEQ NO: 01

RESPONSIBLE AGENCY: -

RESPONSIBLE PERSON: ---

DATE DUE: -----

ACTION DATE: 85/029

STATUS CODE: --

FREE FIELD 1: -

FREE FIELD 2: --

FREE FIELD 3: ---

FREE FIELD 4: ---

FREE FIELD 5: ---

FREE FIELD 6: ---

COMMENT TEXT (80 CHARACTERS MAXIMUM) :

PERMIT ACTION LINKED TO -----

PERMIT ACTION LINK CHANGED FROM ----- TO -----

DELETE PERMIT ACTION LINK TO -----

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME: Houston Lighting & Power Company - Wharton Generating Station

Date rec'd: _____ Rec'd by: _____

XV. GENERATOR'S EPA I.D. NO.

TAC

G T X D O O O 8 3 7 3 5 1 1
1 2 13 14 15



XVI. WASTE MINIMIZATION (narrative description)

The majority of hazardous waste generated by volume at a generating station are treatable hazardous wastewaters that are treated at the facility where the waste is generated prior to discharge from an NPDES permitted outfall. Wastewaters are contained and/or treated in concrete tanks to avoid use of surface impoundments. Hazardous surface impoundments are being closed, under state-approved closure plans, as expeditiously as possible and replaced by concrete tanks.

The remaining hazardous wastes generated at a generating station are from routine maintenance activities or planned construction. The following waste minimization practices have been implemented with respect to wastes generated from these types of activities:

- Hazardous materials used in maintenance and operations at HL&P facilities are ordered in quantities anticipated such as to be completely used within the expected shelf life. Containers of hazardous materials are used until empty. Any excess products are used elsewhere or returned to the manufacturer for credit as appropriate. Disposal as a hazardous waste is the final alternative.
- Hazardous materials which must be used, are used only in quantities necessary to accomplish the required objectives.
- Nonhazardous materials are substituted for hazardous materials whenever the substitute material can accomplish the same or similar objective productively.
- Materials are recycled or reused to the extent practical.
- Waste materials are segregated to avoid nonhazardous waste being mixed with hazardous wastes.
- Extensive sampling of waste is conducted to verify waste classifications which, in many cases, result in nonhazardous designations.

Waste generated, particularly wastewater, is a function of how much and to what extent the facility is generating electricity and a function of the types and extent of maintenance activities that are required at a particular facility. Therefore, comparisons of the volumes of waste actually generated in 1985 with previous years is not a meaningful indicator of the foregoing waste minimization practices.

Tear out here

PERMIT FACILITY MANAGEMENT

86/06/05

PAGE 112

REPORT

HOUSTON PWR & LIGHT TH WHARTON GEN STA.

TXD000837351

C12 01 CLOSURE CERTIFICATION RECEIVED

10/30/85

S

OTHER

OTHER

OTHER

ACT SEQ
NO NO

ACTION ITEM

DUE
DATE

ACTION
DATE

STATUS
CODE

RESP
AGCY

COMMENTS

=====

PERMIT HEADER NO 01 C2003-HEADER PROCESS TYPE: D

PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)

(R)S01 1801.000G (R)S02 3000.000G (R)S04 6000000.000G (R)T01 1699200.000U (R)T02 24000.000U

(S)S01 1801.000G (S)S04 6000000.000G (S)T02 24000.000U

CALLED PERMIT TYPE: DISPOSAL
PART B PERMIT TYPE: DISPOSAL
COVERED PERMIT TYPE: UNDETERMINED

P02 01 PART B RECEIVED

08/07/84

S

P01 01 PART B CALL-IN

02/09/84

S

P33 01 PERMIT APPLICN WITHDRWL REQSTED

08/07/84 04/01/84

FC

S

P32 02 PERMIT APPLIC. WITHDRWL REQ DET.

12/17/84

AR

S

FOR S04 & T02

~~P32 01~~

PERMIT APPLIC. WITHDRWL REQ DET.

12/17/84

S

P39 01 FACILITY MANAGEMENT PLAN SCREEN

07/01/85

S

OTHER

OTHER

OTHER

ACT SEQ
NO NO

ACTION ITEM

DUE
DATE

ACTION
DATE

STATUS
CODE

RESP
AGCY

COMMENTS

=====

ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP AGCY	COMMENTS
=====	=====	=====	=====	=====	=====	=====
PERMIT HEADER NO 01 C2003-HEADER PROCESS TYPE: D						
PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)						
(R)S01	1801.000G (R)S02	3000.000G (R)S04	6000000.000G (R)T01	1699200.000U (R)T02		24000.000U
(S)S01	1801.000G (S)S04	6000000.000G (S)T02	24000.000U			
CALLED PERMIT TYPE: DISPOSAL						
PART B PERMIT TYPE: DISPOSAL						
COVERED PERMIT TYPE: UNDETERMINED						
P02 01	PART B RECEIVED	08/07/84		S		
P01 01	PART B CALL-IN	02/09/84		S		
P33 01	PERMIT APPLICN WITHDRWL REQSTED	08/07/84	04/01/84	FC	S	
P32 02	PERMIT APPLIC. WITHDRWL REQ DET.	12/17/84	AR	S	FOR S04 & T02	
<div>Deleted</div> P32 01	PERMIT APPLIC. WITHDRWL REQ DET.	12/17/84		S		
P39 01	FACILITY MANAGEMENT PLAN SCREEN	07/01/85		S		
OTHER-----						
OTHER-----						
OTHER-----						
ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP AGCY	COMMENTS
=====	=====	=====	=====	=====	=====	=====
PERMIT HEADER NO 02 C2003-HEADER PROCESS TYPE: S						
PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)						
(S)S02	3000.000G (S)T01	1699200.000U				
CALLED PERMIT TYPE: UNDETERMINED						
PART B PERMIT TYPE: STORE/TREAT						
COVERED PERMIT TYPE: UNDETERMINED						
P33 01	PERMIT APPLICN WITHDRWL REQSTED	04/01/84	FE	S	NON REGULATED UNITS.	
P32 01	PERMIT APPLIC. WITHDRWL REQ DET.	12/11/84	AR	S	CERTIFICATED CLOSURE.	

86/06/05

PERMIT FACILITY MANAGEMENT
REPORT

PAGE 111

HOUSTON PWR & LIGHT TH WHARTON GEN STA,
16301 W MONTGOMERY TX 77064
HOUSTON TX 77064

TXD000837351

FACILITY MANAGER:

C305 FAC TYPE D

COUNTY: HARRIS

C119-FACILITY STATUS: EXISTING FACILITY C1105-PERMIT STATUS: INTERIM STATUS

NOTIFICATION DATE: 08/18/80

PART A RECEIPT: 11/19/80

TSD EXISTENCE DATE: 07/01/58

PROC CODES: T02 S01 T01 S04 S02

GEN: X TRANS: X

FACILITY TYPE (BY C1801): DISPOSAL

ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP AGCY	COMMENTS
===	=====	=====	=====	=====	=====	=====

CLOSURE HEADER NO 01 C2003-HEADER PROCESS TYPE: D

PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)

(R)S04	600000.000G (R)T02	24000.000U (S)S04	600000.000G (S)T02	24000.000U
--------	--------------------	-------------------	--------------------	------------

CALLED PERMIT TYPE: DISPOSAL
PART B PERMIT TYPE: DISPOSAL
COVERED PERMIT TYPE: UNDETERMINED

C03 01 CLOSURE PLAN SUBMITTED S

C06 01 PUBLIC NOTICE OF CLOSURE PLAN S

C10 01 FINAL CLOSURE PLAN APPROVED S

C12 01 CLOSURE CERTIFICATION RECEIVED S

C15 01 DATE INSPECTED TO CONFIRM CLOSE S

OTHER

OTHER

OTHER

ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP AGCY	COMMENTS
===	=====	=====	=====	=====	=====	=====

CLOSURE HEADER NO 02 C2003-HEADER PROCESS TYPE: S

PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)

(S)S01	1801.000G
--------	-----------

ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP AGCY	COMMENTS
===	=====	=====	=====	=====	=====	=====
	CLOSURE HEADER NO 01	C2003-HEADER PROCESS TYPE: D				
	PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)					
(R)S04	6000000.000G (R)T02	24000.000U (S)S04	6000000.000G (S)T02			24000.000U
						CALLED PERMIT TYPE: DISPOSAL PART B PERMIT TYPE: DISPOSAL COVERED PERMIT TYPE: UNDETERMINED
C03 01	CLOSURE PLAN SUBMITTED		04/16/84		S	
C06 01	PUBLIC NOTICE OF CLOSURE PLAN		06/02/84		S	
C10 01	FINAL CLOSURE PLAN APPROVED		09/17/84		S	
C12 01	CLOSURE CERTIFICATION RECEIVED		12/11/84		S	
C15 01	DATE INSPECTED TO CONFIRM CLOSURE		10/21/85		S	
	OTHER-----		-----			
	OTHER-----		-----			
	OTHER-----		-----			
ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP AGCY	COMMENTS
===	=====	=====	=====	=====	=====	=====
	CLOSURE HEADER NO 02	C2003-HEADER PROCESS TYPE: S				
	PROCESS CODES/AMOUNT/UNITS: (R=REQUESTED; S=SUBMITTED; C=COVERED)					
(S)S01	1801.000G					
						CALLED PERMIT TYPE: UNDETERMINED PART B PERMIT TYPE: STORE/TREAT COVERED PERMIT TYPE: UNDETERMINED
C03 01	CLOSURE PLAN SUBMITTED		05/13/85		S	ADDITIONAL CLOSURE PLAN.
C06 01	PUBLIC NOTICE OF CLOSURE PLAN		08/16/85		S	
C10 01	FINAL CLOSURE PLAN APPROVED		09/23/85		S	
C12 02	CLOSURE CERTIFICATION RECEIVED		10/29/85		S	
Add C15			10/29/85		S	

PERMIT DEVELOPMENT

86/05/12 STATUS TXD000837351 PERMIT WRITER: COUNTY: HARRIS K6 5-27-80

HOUSTON LGHT&PWR-TH WHARTON GENR STA
16301 W MONTGOMERY
HOUSTON TX 77064
FACILITY STATUS: EXISTING FACILITY
NOTIFICATION DATE: 08/18/80
PROC CODES: T02 S01 T01 S04 S02
GEN: X TRANS: X
TSD EXISTENCE DATE: 07/01/58
FACILITY TYPE: DISPOSAL

ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP PERS	COMMENTS
=====	=====	=====	=====	=====	=====	=====

CLOSURE HEADER NO 01
PROCESS CODES/AMOUNT/UNITS: (R)S04 600000.000G (R)T02 24000.000U

(S)S04 600000.000G (S)T02 24000.000U

CALLED PERMIT TYPE: DISPOSAL
PART B PERMIT TYPE: UNDETERMINED
COVERED PERMIT TYPE: UNDETERMINED

C03 01 CLOSURE PLAN SUBMITTED 04/16/84

C06 01 PUBLIC NOTICE OF CLOSURE PLAN 06/02/84

C10 01 FINAL CLOSURE PLAN APPROVED 09/17/84

C12 1041211

C15 851021

OTHER

OTHER

OTHER

ACT SEQ NO NO	ACTION ITEM	DUE DATE	ACTION DATE	STATUS CODE	RESP PERS	COMMENTS
=====	=====	=====	=====	=====	=====	=====

PERMIT HEADER NO 01

PROCESS CODES/AMOUNT/UNITS: (R)S01 1801.000G (R)S02 3000.000G (R)S04 600000.000G (R)T01 1699200.000U (R)T02 24000.000U

(S)S01 1801.000G (S)S04 600000.000G (S)T02 24000.000U

CALLED PERMIT TYPE: DISPOSAL
PART B PERMIT TYPE: UNDETERMINED
COVERED PERMIT TYPE: UNDETERMINED

Add PERMIT HEADER

✓ (S) 502 3000 G

(S) 701

1699200. u

(S)

Add

P33 ✓

✓ 84001

✓ FE

✓ NON REGULATED UNITS

P 32 ✓

✓ 841211

✓ AR

✓ certificated closure

Add ✓

CLOSURE HEADER

(S) 501

1801.000 G

(S)

C03 ✓

✓ 850513

C06 ✓

✓ 850816

C10 ✓

✓ 850923

C12 ✓

✓ 851030

C15 ✓

✓ 851029

Additional Closure Plan

P 32 ✓

✓ 841211

✓ AR

✓ Certificated closure

Add ✓

Closure

HEADER

(S) 501

1801.000 G

✓

C03 ✓

C06 ✓

C10 ✓

C12 ✓

C15 ✓

✓ 850513

✓ 850816

✓ 850923

✓ 851030

✓ 851029

(S)

Additional Closure Plan

DATA CHANGES

*HL 888
Wheeler*

EPA IDENTIFICATION NUMBER/C101=12																				TWC #/C116=6										PREPARER										DATE									
1 X D 0 0 0 0 8 3 4 3 5 1																														G4										1-22-88									
Facility Name/C104=40																																																	
Mailing Address/C106=30																																																	
City/C107=25																																																	
Facility Contact Person/C105=30																																																	
Location Address/C110=30																																																	
City/C111=25																																																	
Owner's Name/C1503=40																																																	
GEN TRN TSD UIC																																																	
C1105 C305																																																	
Other																																																	
C 119 = 1																																																	
Waste Codes to be added/C2701																																																	
C 119 =																																																	
Waste Codes to be deleted/C2701																																																	
Process Codes - Add - Delete - Change																																																	
C1801=3 C1802=13																																																	
C1803=1 C1804=1																																																	
C1801=3 C1802=13																																																	
C1803=1 C1804=1																																																	
C1801=3 C1802=13																																																	
C1803=1 C1804=1																																																	
Other Coding as necessary																																																	

Entered by: R.V. Date Entered: 2.4-88 QC: File Code: II. 1. B

FIN 10-15-97 PM

114614

IHW020

*** TEXAS NATURAL RESOURCE CONSERVATION COMMISSION ***
Notice of Registration
Industrial and Hazardous Waste

Page: 1
Date: 07/15/97

This registration does not constitute authorization of any waste management activities or facilities listed below. The registration reflects hazardous and/or industrial waste generation and management activities for which the registrant has provided notification. Requirements for solid waste management are provided by Texas Administrative code section 335 of the rules of the Texas Natural Resource Conservation Commission (TNRCC). Changes or additions to waste management methods referred to in this notice require written notification to the TNRCC.

Solid Waste Registration Number: 31636 EPA Id: TXD0000837351

The Solid Waste Registration Number provides access to computerized and filed information pertaining to your operation. Please refer to that number in any correspondence.

Company Name: ~~Houston Lighting & Power, The Light Company~~
Site Name: ~~T.H. Wharton E.G.S.~~
Site Location: 16301 State Hwy. 249, Houston, TX
Contact: Bye, R. T.

Region: 12
County: 101 Harris
Title:
Initial Registration Date: 12/14/1979
Last Amendment Date: 06/24/1997
Last Date NOR Computer update: 07/11/1997
Phone: 713-945-8201

Change Company Name to:
Houston Industries Incorporated

Mailing Address: P.O. Box 1700
Houston, TX 77251-1700

Site Street Address: 16301 State Hwy. 249
Houston, TX 77064

Registration Status: Active
Registration Type: Generator
Generator Type: Industrial

Reporting Method: STEERS

Hazardous Waste Generation Status: Large Quantity Generator

Primary SIC Code: 4911 Electric Services
Handler Status:

Change Operator Name to:
Operator Information
Name: ~~Houston Lighting & Power Co.~~ **Houston Industries Power**
Phone:
Address: P.O. Box 1700
Houston, TX, 77251
Generation

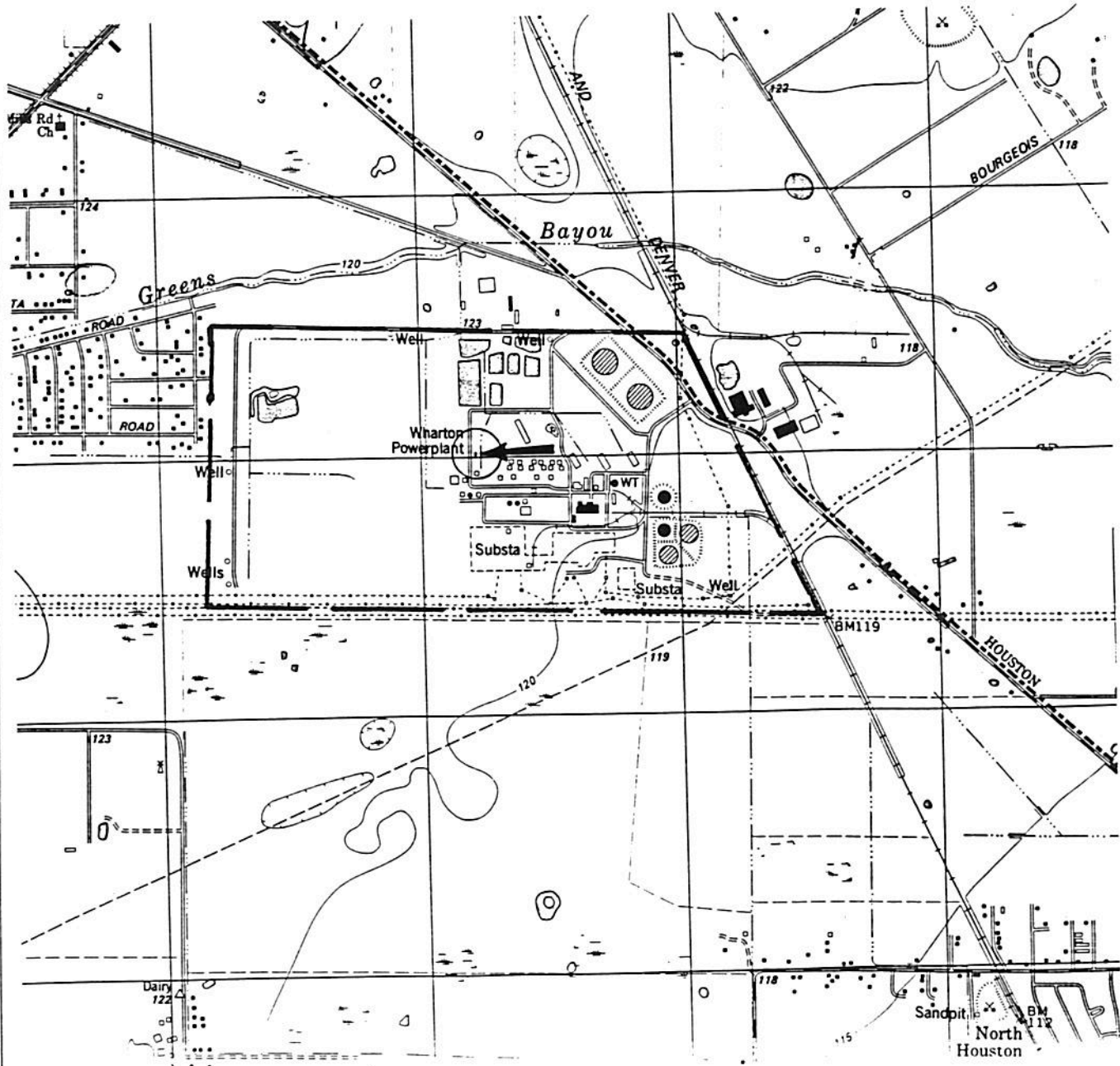
Owner Information
Name:
Phone:
Address:

As of 06/24/1997 - the next unassigned sequence number for WASTES is 0414 and
the next unassigned sequence number for UNITS is 014.

Section 335, Chapter 31 of the Texas Administrative Code specifies the notification, record keeping, manifesting and reporting requirements for hazardous and industrial solid wastes.

W. Montgomery in RCIS

This facility has been modified in the Resource Conservation and Recovery Information System (RCRIS) to a Large Quantity Generator (LQG). This modification to RCRIS was done April 29, 1995 per the instruction of the State of Texas (TNRCC). The LQG modification was based on responses TNRCC received to letters regarding their annual report. Due to the response received from this company, they have been coded as a LQG. All supporting documentation can be found in TNRCC's central records.



TXD000837351
 HOUSTON LIGHT AND POWER
 T.H. WHARTON STATION
 LATITUDE: 29° 56' 35"N
 LONGITUDE: 95° 32' 09"W
 HARRIS COUNTY
 USGS, SATSUMA (1982),
 TEXAS QUADRANGLE

04/22/92

WF MCGUIRE MGR
EGSI HL&P WHARTON PLANT
PO BOX 1700
HOUSTON , TX 77001

RE: EPA ID NUMBER TXD000837351
SEC ID NUMBER 031636
16301 W MONTGOMERY
HOUSTON ,TX 77064

DEAR WF MCGUIRE :

ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

THIS IS TO ACKNOWLEDGE THAT YOU HAVE FILED A NOTIFICATION OF REGULATED WASTE ACTIVITY FOR THE INSTALLATION LOCATED AT THE ADDRESS LISTED ABOVE TO COMPLY WITH SECTION 3010 OF THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA). YOUR EPA IDENTIFICATION NUMBER FOR THAT INSTALLATION APPEARS JUST ABOVE THE LOCATION ADDRESS. THE EPA IDENTIFICATION NUMBER MUST BE INCLUDED ON ALL SHIPPING MANIFESTS FOR TRANSPORTING HAZARDOUS WASTES; ON ALL ANNUAL REPORTS THAT GENERATORS OF HAZARDOUS WASTE, AND OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES MUST FILE WITH EPA, ON ALL APPLICATIONS FOR A FEDERAL HAZARDOUS WASTE PERMIT; AND OTHER HAZARDOUS WASTE MANAGEMENT REPORTS AND DOCUMENTS REQUIRED UNDER SUBTITLE C OF RCRA.

for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Regulated Waste Activity

United States Environmental Protection Agency

(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☒

A. First Notification

☐

B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

1 X 1 0 0 0 8 3 7 3 5 1

II. Name of Installation (Include company and specific site name)

E G S I H. L. & P. W H A R T O N P L A N T

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1 6 3 0 1 W E S T M O N T G O M E R Y R O A D

Street (continued)

City or Town

H O U S T O N T X

County Code

County Name

1 0 1 H A R R I S

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P. O. E D X 3 9 4 6

City or Town

H O U S T O N T X

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

M A R T S S T E V E

Job Title

Phone Number (area code and number)

E N G I N E E R T E C H. 7 1 3 - 6 5 6 - 3 4 8 3

VI. Installation Contact Address (See Instructions)

A. Contact Address Location

B. Street or P.O. Box

X

City or Town

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

E X X O N G A S S Y S T E M I N C

Street, P.O. Box, or Route Number

P. O. B O X 3 9 4 6

City or Town

H O U S T O N T X

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

7 1 3 - 6 5 6 - 3 4 8 3 P P Yes No

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity	B. Used Oil Fuel Activities
<p>1. Generator (See Instructions)</p> <p><input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs)</p> <p><input checked="" type="checkbox"/> c. Less than 100 kg/mo (220 lbs)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify </p>	<p>1. Off-Specification Used Oil Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketer</p> <p><input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p>2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification</p> <p><input type="checkbox"/></p>
<p><input type="checkbox"/> 3. Treator, Storer, Disposer (at Installation) Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<div style="display: flex; justify-content: space-between;"> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes)

<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">1</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">7</div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">2</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">8</div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">3</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">9</div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">4</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">10</div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">5</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">11</div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">6</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">12</div>
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C. Other Wastes. (State or other wastes requiring an I.D. number. See Instructions.)

<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">1</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">2</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">3</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">4</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">5</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div>	<div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;">6</div> <div style="display: flex; justify-content: space-around; width: 100%;"> </div>
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X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature Stan W. Golis	Name and Official Title (type or print) STAN W. GOLIS ENGINEERING MANAGER	Date Signed 2-18-92
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XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)